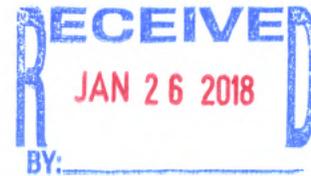


VIA EMAIL AND FEDERAL EXPRESS

January 22, 2018



Mr. Allan C. Beshore  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration  
901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

**Re: Response to Notice of Probable Violation and  
Proposed Compliance Order (CPF 3-2018-5001)**

Dear Mr. Beshore,

On January 5, 2018, Savage Bakken Connector, Inc., (Savage) received a Notice of Probable Violation and Proposed Compliance Order (NOPV) in CPF 3-2018-5001. Savage requested the PHMSA case file on January 10 and received the case file on January 17. This letter serves as Savage's timely response to the NOPV, as provided in Section I of the *Response Options for Pipeline Operators in Compliance Proceedings* and in 49 C.F.R. § 190.208(b).

The NOPV alleged that Savage did not test 14 safety devices on the Bakken Connector pipeline under conditions approximating actual operations before product was put in the pipeline, as required by 49 C.F.R. § 195.262(c). All of the safety devices were tested by the manufacturer prior to installation to ensure proper functioning, which Savage believed satisfied the requirement. The proposed compliance order would require Savage to test all safety devices that have not been tested under conditions approximating actual operations within 30 days of issuance of the Final Order.

In light of the NOPV and consistent with the proposed compliance order, Savage has scheduled testing of the 14 devices to be performed by a contractor on February 5-6, 2018. All safety devices will be removed, visually inspected, and tested per ASME Boiler & Pressure Vessel Code Section VIII, *Rules for Construction of Pressure Vessels*, and API 527, *Seat Tightness of Pressure Relief Valves*, on a bench top test stand. All devices will be pop tested to verify compliance of the pressure set point. Seat tightness and back pressure will also be tested and verified.

In addition, Savage will ensure that its construction procedures for future projects include provisions to test safety devices in compliance with § 195.262(c).

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Savage will inform PHMSA when this testing has been completed and will provide your office with records of the completed testing. Please do not hesitate to contact me if you have any questions.

Respectfully submitted,



Kelly J. Flint  
Executive Vice President and General Counsel  
Savage Bakken Connector, Inc.