

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 15, 2019

David Dehaemers
President
Tallgrass Energy, LLC
Trailblazer Pipeline
370 Van Gordon Street
Lakewood, CO 80228

CPF 3-2019-1001M

Dear Mr. Dehaemers:

From March 7, 2017, through August 31, 2017, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Tallgrass Trailblazer Pipeline procedures for operations, maintenance, and emergencies in Lakewood, CO.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Tallgrass Energy, LLC's (Tallgrass') plans or procedures, as described below:

1. §192.605 Procedural manual for operations, maintenance, and emergencies

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and Subpart M of this part.

Tallgrass did not have adequate procedures for operations and maintenance activities as required by Subparts L & M, 49 CFR Part 192. The procedure to ensure the inspection of transmission linebreak valves that might be required during any emergency in accordance to §192.745 was inadequate. PHMSA inspectors reviewed Tallgrass Procedure O&M 301_G

titled, "Inspecting and Servicing Emergency Valves." The procedure stated, "Inspect and service valves in conformance with manufacturers' recommendations." PHMSA reviewed the two manufacturer's recommendations that were provided by Tallgrass for the linebreak valves- "Automatic Linebreak Control Adjustment and Set-up Procedure ALBC 1983-Present" and the "Shafer valve Company Adjustment and Setting Procedure for Shafer Automatic Line Break Control." A review of valve maintenance records found documentation where the rate of drop was not in accordance with the manufacturers' recommendations.

The Shafer Valve Company Adjustment and Setting Procedure for Shafer Automatic Line Break Control and the Automatic Linebreak Control Adjustment and Set-up Procedure ALBC 1983-Present manufacturer's recommendations require different ranges for rate of pressure drop calibrations. The ALBC manufacturer's recommendations require that the rate of drop for the #72 orifice and 1640 cubic inch tank should never exceed 18 psi/min. Shafer manufacturer recommendations were reported by Tallgrass for the #72 orifice and 1640 cubic inch tank to be calibrated between 18-30 psi.

Tallgrass does not have a procedure to ensure that linebreak valves are properly maintained to ensure pressure sensing systems will adapt to pressure and flow changes (rate of drop) in order to minimize or eliminate accidental valve closures.

2. §192.605 Procedural manual for operations, maintenance, and emergencies.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.

At the time of the inspection, Tallgrass's O&M 903_GL titled, "External Corrosion Control for Buried or Submerged Pipelines," procedures were inadequate because the procedures did not describe how voltage (IR) drops - other than those across the structure electrolyte boundary - would be calculated for valid interpretation of annual pipe-to-soil readings. As such, the procedures do not provide for a level of cathodic protection (CP) that complies with one or more of the applicable criteria contained in 49 CFR Part 192, Appendix D.

49 CFR §192.463 (a) requires that "[e]ach cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria."

49 CFR 192, Appendix D,II - *Interpretation of voltage measurement* requires that "[v]oltage (IR) drops other than those across the structure electrolyte boundary must be considered for valid interpretation of the voltage measurement in paragraphs A(1) and (2) and paragraph B(1) of section I of the appendix."

Tallgrass's O&M 903_GL states in Attachment 3, "Existing industry standards provide several example methods in which the IR drop may be considered including measuring or calculating

the IR drop, reviewing the historical CP system performance, evaluating the physical and electrical characteristics of the pipe and its environment, and determining whether there is physical evidence of corrosion.” The procedure did not discuss how to calculate IR drop or how to use the industry standards referenced in Attachment 3 to calculate IR Drop.

3. §192.605 Procedural manual for operations, maintenance, and emergencies.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.

At the time of the inspection, Tallgrass's O&M 903_GL titled, “External Corrosion Control for Buried or Submerged Pipelines,” procedure was inadequate because the procedure describes interference tests as a desired action not a requirement, which does not minimize adverse effects on existing adjacent underground metallic structures. 49 CFR § 192.473(b) requires that “[e]ach impressed current type cathodic protection system or galvanic anode system must be designed and installed so as to minimize any adverse effects on existing adjacent underground metallic structures.”

Tallgrass's O&M 903_GL, Section 3.4.8. “Interference Test Surveys” states, “Conduct interference tests on metallic structures in the immediate area after energizing new CP units or after installing metallic structures in the area of influence of a CP unit if either party desires.” Tallgrass procedure does not ensure that interference testing is conducted to minimize any adverse effects on existing adjacent underground metallic structures. The Tallgrass procedure relies solely on the desires of either party after newly installed CP units or other metallic structures.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are

not contesting this Notice, we propose that you submit your amended procedures to my office within 45 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Tallgrass Energy, LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Allan C. Beshore, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2019-1001M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Allan C. Beshore
Director, Central Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*