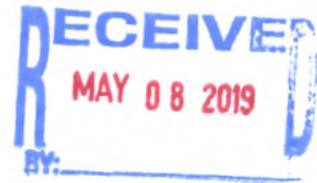




May 2, 2019

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



Re: **CPF No. 3-2019-1001M - Notice of Amendment – Trailblazer Pipeline**

Dear Mr. Beshore,

Tallgrass Energy, LLC (Tallgrass) has compiled a response for each item number listed in the Notice of Amendment (NOA) received on April 2, 2019 indicating apparent inadequacies found within our procedures during an inspection conducted from March 7, 2017 through August 31, 2017.

Item 1

Tallgrass would like to request a 90-day extension as specified in section IV of “**Response Options for Pipeline Operators in Enforcement Proceedings**” to allow ample time to obtain requested information from the manufacturer of the pneumatically controlled valves installed on Trailblazer. Before amending O&M Procedure *OM301_G – Inspecting and Servicing Emergency Valves* it is crucial that the correct rate of drop be explained for the varying orifice sizes and pressure/flow on each segment of the pipeline. Tallgrass is confident we are properly maintaining these valves to ensure proper operation in response to pressure and/or flow changes while minimizing accidental valve closures, but if procedure modifications are deemed necessary they will be made and communicated to your agency.

Item 2

An example IR Drop calculation was placed into O&M Procedure *OM903_GL – External Corrosion Control for Buried or Submerged Pipelines* to satisfy a request made by your agency earlier this year during an inspection of our REX pipeline as illustrated below.



No. OM903_GL
Title: External Corrosion Control for Buried or Submerged Pipelines
Revised: January 1, 2019

O&M PROCEDURE

Attachment 4 – Calculating IR Drop

NOTE: All readings are negative (-) unless otherwise indicated.

ON P/S _____ (From annual survey or other testing)
INSTANT OFF P/S _____ (Requires simultaneous rectifier interruption)
DEPOLARIZED P/S _____ (Requires that all affecting rectifiers be shut down a minimum of 24 hours)

IR Drop
ON P/S _____
(less) INSTANT OFF P/S (-) _____
(equals) IR Drop (=) _____

Item 3

Interference testing to minimize adverse effects on existing adjacent underground metallic structures is required by Tallgrass in compliance with §192.473(b) as stated throughout O&M Procedure *OM903_GL – External Corrosion Control for Buried or Submerged Pipelines* (sections 3.1, 3.2, 3.2.2, 3.4.3, 3.4.7, 3.4.8, 3.7, 5, 5.2, 5.3.1, 5.3.3, Attachment 3 and interference test report records specifically). Section 3.4.8 of the procedure has been revised to remove the verbiage deemed misleading.



No. OM903_GL
Title: External Corrosion Control for Buried or Submerged Pipelines
Revised: January 1, 2019

O&M PROCEDURE

3.4.8. Interference Test Surveys

Each impressed current-type cathodic protection system or galvanic anode system must be designed and installed to minimize any adverse effects on existing adjacent underground metallic structures. 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. Use O&M Form *OM900-02_GL – Interference Test Report* to record results. Resolve any interference problem to the mutual satisfaction of the parties involved.

As shared previously, we appreciate the feedback provided by your agency, and the opportunity to improve our procedures. Procedure effectiveness reviews are conducted on a regular basis, which proves our commitment to enhancing and correcting identified issues. Please do not hesitate to contact me should you have any questions or would like to discuss any of the material provided in further detail.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Eckels", with a long horizontal line extending to the right.

Jennifer Eckels
Compliance Manager, Tallgrass Energy
370 Van Gordon Street | Lakewood, CO 80228 | Phone: (303) 763-3486

CC: Tallgrass – Mick Rafter, Craig Meis, Jay Meyers, Chris Jones
PHMSA – Karen Butler