



February 15, 2019

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

Re: **CPF No. 3-2019-5004W**
Warning Letter – Tallgrass Pony Express Pipeline, LLC

Dear Mr. Beshore:

Tallgrass Pony Express Pipeline, LLC (PXP) is not contesting the items denoted in the Warning Letter received on January 16, 2019 indicating violation of the Pipeline Safety Regulation, Title 49, Code of Federal Regulations, §194.107 General response plan requirements and §195.403 Emergency Response Training. However, please know that after these items were identified from the drill conducted on August 3, 2016, prompt actions were taken to enhance both the PXP Emergency Response Plan (ERP), and necessary training of its contents, to ensure personnel responding to an actual event respond appropriately as is practiced during each drill exercise performed.

Evidence illustrating that the qualified individual (QI) notification exercise has occurred during non-business hours since identifying it was not conducted in 2014, the year the pipeline was placed into operation, is enclosed for review.

In response to recommendations provided by representatives of your agency at the end of the drill, and in addition to feedback provided from the lessons learned conducted with internal stakeholders, the ERP was revised to remove the language detailing the time to dedicate to a drill based on the level of event described in the drill scenario. Enclosed is the ERP revision history which indicates modifications were made to address this item of concern in the month following the drill. It was determined inappropriate to assign a designated length of time to a drill when the goal is to focus attention on ensuring appropriate actions are taken to protect people, property, and the environment.

We greatly appreciate the feedback provided by your agency and for having been allowed the opportunity to improve our ERP and associated drills. Quick action taken to remedy these items proves our commitment to enhancing and correcting identified issues with the goal of mitigating any potential issues in the future. 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 flourish extending to the right.

Jennifer Eckels
Compliance Manager
Tallgrass Energy

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

Enclosures:

The following enclosures are provided to illustrate the remedial actions taken to address both items contained in the Warning Letter:

- QI notification drill (non-business hours) documentation for 2015 through 2018
- ERP revision history