April 6, 2020

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

RE: Notice of Amendment CPF 3-2019-6007M

Dear Mr. Beshore,

Crestwood Equity Partners, L.P. (“Crestwood”) submits the following revised response to the Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) Notice of Amendment CPF 3-2019-6007M (“NOA”). This letter provides Crestwood’s formal response to Items 1 through 5 identified in the NOA.

1. Crestwood’s breakout tank inspection procedure 2.19 failed to incorporate the 5-year external inspection cycle as required by API Standard 653 Section 6.3.2.1. Crestwood’s procedural manual must be amended to include this requirement.

Response: Crestwood’s O&M procedure 2.19 Breakout Tank Subsection 2.19.10.3 External Inspections has been amended. See Attachment 1 attached hereto.

2. Crestwood’s IMP did not contain adequate procedures to identify line segments that could affect high consequence areas (HCA). Specifically, the manual did not have procedures on how Crestwood conducts an analysis of the pipeline along the right-of-way and for breakout tanks and pump station facilities. Crestwood’s IMP
procedures must be amended to include details on the process to identify these line segments that could affect HCA directly, by overland spread or water transport.

Response: Crestwood’s IMP procedures Section 1.8.5 Covered Segment Definitions, Section 2.1 and 2.2 and its sub-sections have been amended. See Attachment 2 attached hereto.

3. Crestwood’s IMP did not have procedures to identify and evaluate the risks to the breakout tanks and pump station in Epping, ND that could affect HCAs.

Response: Crestwood’s IMP procedures Section 2.3 Threat Identification Subsection 2.3.7 Risk Assessment and Section 7.3. Threat Identification and Risk Assessment Subsection 7.3.1 Risk Assessment have been amended. See Attachment 3 attached hereto.

4. Crestwood’s IMP did not include procedures to perform continual evaluations of facility integrity for the breakout tanks and pump station in Epping, ND. Crestwood must amend its IMP to include this requirement.

Response: Crestwood’s IMP procedure Section 3.3 Continual Evaluation and Assessment has been amended. See Attachment 4 attached hereto.

5. Crestwood’s IMP did not include procedures for the identification of facility preventive and mitigative measures to protect the HCAs for the breakout tanks

Response: Crestwood’s IMP procedure Section 4.3 Preventative and Mitigative Measures has been amended. See Attachment 5 attached hereto.

Crestwood believes that the responses herein address and clarify the concerns identified during the PHMSA inspection conducted at the Colt Hub facility in Epping, North Dakota as outlined in the NOA.
Respectfully,
Crestwood Midstream Partners LP

Signature: [Signature]

Print Name: Joubin Sadeghian

Title: Vice President of Project Management