

November 30, 2020

Mr. Gregory A. Ochs  
Director, Central Region OPS  
Pipeline and Hazardous Materials Safety Administration  
901 Locust Street, Suite 480  
Kansas City, MO  
64106

**Re: Vantage Pipeline US LP's Notice of Amendment (CPF 3-2020-5031M)**

Dear Mr. Ochs,

Vantage Pipeline US LP (Vantage) values the partnership it has with the Pipeline and Hazardous Material Safety Administration (PHMSA) in assuring public safety and regulatory compliance. Vantage continues to maintain plans, procedures, and standards that meet or exceed PHMSA regulations while maintaining a safety culture that proactively promotes and recognizes operational compliance as a top priority.

This letter is confirming the receipt of the "Notice of Amendment" regarding apparent inadequacies found by PHMSA representatives within the Vantage plans and/or procedures during the inspection of the Operation and Maintenance, Public Awareness, Damage Prevention, Emergency Response, Integrity Management, Time Dependent Threats, Operator Qualification and Assessment and Repair from February 11, 2019 through March 21, 2019. Vantage appreciates PHMSA's efforts during the audit and the valuable input regarding areas to improve our plans and procedures. We find this process useful to further refining our Pipeline Safety Programs.

**In regard to NOA #1 (§195.401 (b)(1)) stating that "Vantage's Operation and Maintenance manual (O&M) was inadequate because it did not clearly define immediate hazard to persons or property and state the operator cannot operate unsafe parts of the system."** Vantage is not contesting the Notice and has amended the US Vantage Pipeline System IMP Manual Version 3.0 May 31, 2019 Section 7.3 as of 6-19-2019 to address this issue. Vantage had submitted the amended section to PHMSA prior to this Notice and acknowledges that PHMSA has found Section 7.3 satisfactorily amended and that no further action is required from Vantage to address this issue.

**In regard to NOA #2 (§195.402 (c)(13)) stating that Vantage's O&M manual was inadequate because there was no procedure covering "Periodically reviewing the work done by operator to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found."** Vantage is not contesting the Notice and has amended the O&M procedure VAN-OPS-012 as of July 24, 2019 to address this issue. Vantage had submitted the amended section to PHMSA prior to this Notice and acknowledges that PHMSA has found O&M procedure VAN-OPS-012 satisfactorily amended and that no further action is required from Vantage to address this issue.

**In regard to NOA #3 (§195.446 (b)(1)) stating that Vantage's Control Room Management (CRM) manual was inadequate because it did not clearly define "Physical domain of responsibility" to include both the physical pipeline assets being monitored and controlled, and SCADA/communications assets (such as desks, consoles, phones, radios, etc.) being used in support of monitor and control duties.** Vantage is not contesting the Notice and has amended the US Vantage Pipeline System Pipeline Control Room Management Program Section 1.1 and Section 1.2 to address this issue as of July 1, 2019. Vantage had submitted the amended section to PHMSA prior to this Notice and acknowledges that PHMSA has found the US Vantage Pipeline System Pipeline Control Room Management Program Section 1.1 and Section 1.2 satisfactorily amended and that no further action is required from Vantage to address this issue.

**In regard to NOA #4 (§195.446 (d)(1)(2)(3)(4)) stating that Vantage's Fatigue Management manual (FMP) was inadequate because Section 2 of the FMP did not require a risk assessment record to be maintained. Specifically Section 2 states "The SPCC Leadership Team will review annually, not to exceed 15 months, the schedules, workspace conditions, ergonomics, training, fatigue risks, fatigue countermeasures and affected personnel to ensure the most optimal working conditions and resources are available and followed."** Vantage is not contesting the Notice and has amended the US Vantage Pipeline System Fatigue Risk Management Plan Section 2.1 and 2.3 to address this issue as of July 10, 2019. Vantage had submitted the amended section to PHMSA prior to this Notice and acknowledges that PHMSA has found the US Vantage Pipeline System Fatigue Risk Management Plan Section 2.1 and 2.3 satisfactorily amended and that no further action is required from Vantage to address this issue.

**In regard to NOA #5 (§195.505 (C)) stating that Vantage's Operator Qualification (OQ) manual was inadequate because hot tapping had a 1 – 1 span of control and should be a 1 – 0 span of control.** Vantage is not contesting the Notice and has amended the Vantage OQ Manual to state that hot tapping will be a 1 – 0 span of control to address this issue as of March 7, 2019. Vantage had submitted the amended section to PHMSA prior to this Notice and acknowledges that PHMSA has found the OQ Manual satisfactorily amended and that no further action is required from Vantage to address this issue.

If you need further information or clarification regarding this matter, please contact Bob Bachmeier at (701) 628-9397 (office) or (701) 509-1626 (cell).

Sincerely,

Bob Bachmeier  
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Pembina Pipeline Corporation  
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CC:

Scott Seibert, Manager, Environment, Operations & Compliance U.S.  
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