

January 15, 2021

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

**Re: Aux Sable Liquid Product's Notice of Amendment (CPF 3-2020-6004M)**

Dear Mr. Ochs,

Aux Sable Liquid Products, Inc. (Aux Sable) values the partnership it has with the Pipeline and Hazardous Material Safety Administration (PHMSA) in assuring public safety and regulatory compliance. Aux Sable 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 Aux Sable plans and/or procedures during the inspection of Aux Sable's procedures, records, and pipeline facilities in Morris, Illinois from March 25, 2019 through March 29, 2019 and July 15 through July 19, 2019. Aux Sable 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.

**Regarding NOA #1- which states that "Aux Sable's procedural manual failed to address line marker placement and maintenance and are therefore inadequate to comply with §195.410(a)(1)." Aux Sable is not contesting the Notice and has amended Section 6.9, Subpart F – Operation and Maintenance of its O&M manual. Aux Sable has submitted the amended section along with this Notice. The amended section is highlighted in yellow.**

**Regarding NOA #2 - stating that "Aux Sable's procedural manual failed to provide adequate instructions to operating personnel for conducting ground patrols in accordance with the requirements of § 195.412." Aux Sable is not contesting the Notice and has amended the O&M Section 6.10, Subpart F – Operation and Maintenance to address this issue. Aux Sable has submitted the amended section along with this Notice. The amended section is highlighted in yellow.**

**Regarding NOA #3 stating that "Aux Sable's procedural manual was inadequate to assure compliance with the record keeping requirements of § 195.452(l)(1)(ii) for information analysis required by § 195.452(f)(3)." Aux Sable is not contesting the Notice and is requesting additional time to amend Aux Sable's Liquid IMP manual to address the issue. Aux Sable received the notice on December 16<sup>th</sup>, 2020, the party responsible to amend the manual was on vacation prior to receiving the notice, along with the holidays, they did not return to work until January 6<sup>th</sup>,**



2021. A meeting was set up with responsible parties on January 11<sup>th</sup>, 2021, with approvals and review needed after the amendment was completed, it is anticipated the amendment will be completed by no later than January 20<sup>th</sup>, 2021. Aux Sable is requesting the additional 5 days to complete the amendment within the IMP to address the issue.

**Regarding NOA #4 - Aux Sable's procedure for inspecting the internal surface of pipe removed from the pipeline was inadequate to assure compliance with § 195.579(c), which is included within subpart H of part 195.** Aux Sable is not contesting the Notice and has amended the O&M Section 7.15, Subpart H-Corrosion Control to address this issue. Aux Sable has submitted the amended section along with this Notice. The amended section is highlighted in yellow.

**Regarding NOA #5 - Aux Sable's procedural manual failed to provide complete instructions on the information required to be recorded for abnormal operations. As part of its procedural manual, Aux Sable's "Control Room Management Plan" directed the controller to complete a "Pipeline Event analysis form" for abnormal operations. The form contained a space for the controller to "Describe the Emergency," but Aux Sable did not specify what needed to be recorded therein anywhere in the "Control Room Management Plan" procedure.** Aux Sable is not contesting the Notice and is requesting additional time to amend Aux Sable's Control Room Management manual to address the issue. Aux Sable received the notice on December 16<sup>th</sup>, 2020, the party responsible to amend the manual was on vacation prior to receiving the notice, along with the holidays, they did not return to work until January 4<sup>th</sup>, 2021. A meeting was set up on January 6<sup>th</sup> with responsible parties and it was noted that the "Pipeline Event Analysis form is no longer being utilized and they will be transitioning to the "SMART" reporting tool. A meeting was set up on January 12<sup>th</sup>, 2021 to review the "SMART" reporting tool to ensure it would encompass the required documentation, after review there were changes required and it is anticipated the amendment will be completed by no later than January 19<sup>th</sup>, 2021. Aux Sable is requesting the additional 4 days to complete the amendment within the IMP to address the 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  
Senior Advisor, Regulatory Pembina US  
Pembina Pipeline Corporation  
BBachmeier@Pembina.com

CC:

Scott Seibert, Manager, Environment, Operations & Compliance U.S.  
Tony Stover, Pipeline Supervisor  
John Cardone, Senior Manager, Midwest NGL, Channahon District