



September 16, 2021

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

Re: CFP 3-2021-015-NOPV

Dear Mr. Ochs,

We have received Notice of Probable Violation CFP 3-2021-015-NOPV, dated August 17, 2021. We are not contesting the alleged violation, and we intend to pay the proposed civil penalties outlined in the NOPV.

As per our earlier discussion, we will wait to make any penalty payments until we receive the order with the findings of violation.

I have listed some of the actions we are taking to address these items, and to ensure compliance going forward:

1. 194.117 Training

We have secured the P.R.E.P. Guidelines and are crosschecking them with our Emergency Response Plans, and will ensure the plan is complete and suitable, that appropriate training is assigned and completed, and the proper drills are scheduled, performed, and documented.

Training will be assigned and tracked in our Computer Based Training system called SavageU, where training will be assigned to the appropriate Team Members, and training progress, deadlines, and histories will be monitored and tracked.

Emergency drills will be scheduled and tracked using ManagerPlus, an asset management software system that generates and tracks work orders based on scheduled tasks and requirements. Use of this system will ensure the proper number and type of drills are completed as required, as the auto-generated work order will remain open and visible until the task is completed and closed.

2. 195.61 NPMS

The annual NPMS submissions will be also be scheduled in ManagerPlus. This will be advantageous for the reasons outlined earlier in this letter. Not only will ensure that the required submissions are only scheduled in one Team Member's calendar, they will be managed in a system with multiple users and managerial oversight.

3. 195.404 Maps and Records

Our system has been reconfigured to record live pump discharge pressure on all the pumps, not just the main line discharge pressure, and it records the pressures live every few milliseconds. This trend/report can be viewed at any time or exported for a more detailed review. I've attached two trend snapshots showing examples of the pressure trend data used to formulate the averages.

4. 195.589 Corrosion Control Information

All rectifier inspections and the annual cathodic protection surveys will also be scheduled and tracked in ManagerPlus, and regular reviews of open and upcoming action items will be held to ensure all required surveys and inspections are both scheduled and completed. Additionally, I have attached some additional past rectifier inspections for your team's review.

Sincerely,



Chad Jordan
Sr. Manager – SH&E
Savage Services

Attachments: *DAPL Trend 9-14, 9-15*
TrendX 5sec blocks