



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

901 Locust Street, Suite 480
Kansas City, MO 64106

**NOTICE OF PROBABLE VIOLATION
PROPOSED CIVIL PENALTY
and
PROPOSED COMPLIANCE ORDER**

VIA ELECTRONIC MAIL TO: bill.moler@tallgrassenergylp.com;
jennifer.eckels@tallgrassenergylp.com; brad.armsbury@tallgrassenergylp.com;
crystal.heter@tallgrassenergylp.com

December 7, 2021

Mr. William Moler
President and Chief Executive Officer
Tallgrass Interstate Gas Transmission, LLC
2400 W. 115th Street, Suite 350
Leawood, KS 66221-2609

CPF 3-2021-043-NOPV

Dear Mr. Moler:

From February 6 through November 19, 2020, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Tallgrass Interstate Gas Transmission, LLC's (Tallgrass) records in Lakewood, Colorado.

As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

1. § 191.5 Immediate notice of certain incidents.

(a)

(c) Within 48 hours after the confirmed discovery of an incident, to the extent practicable, an operator must revise or confirm its initial telephonic notice required in paragraph (b) of this section with an estimate of the amount of product released, an estimate of the number of fatalities and injuries, and all other significant facts that are known by the operator that are relevant to the cause of the incident or extent of the damages. If there are no changes or revisions to the initial report, the operator must confirm the estimates in its initial report.

Tallgrass failed to provide a National Response Center (NRC) update within 48-hours regarding an incident on the Tallgrass Interstate Gas Transmission, LLC (TIGT) system at Kimball, Nebraska, as required under § 191.5(c). A two-inch vent valve failed to cycle closed on November 20, 2019, and remained venting gas until personnel arrived on site on December 1, 2019 and closed the valve. Tallgrass did not notify the NRC until 17:19 on December 5, 2019, when the operator determined the amount of gas released exceeded 3 MMCF. Tallgrass failed to submit the 48-hour NRC Update to revise or confirm its initial notice until 15:08 on December 9, 2019, approximately 96-hours after the initial notice.

2. § 192.463 External corrosion control: Cathodic protection.

(a) Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.

Tallgrass failed to provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part for each cathodic protection system. On November 18, 2020, Tallgrass provided a list of pipeline segments that did not meet the criteria of cathodic protection contained in appendix D. The following instances were described as missing the required criteria for PHMSA inspection Unit 15545:

Segment	Mile Post / Station	HCA (Y or N)	Identified Discrepancies? (Rectifier, Critical Bond, Non Critical or Annual Reading)	Missing Record or Inspection not conducted in the required interval	Dates (Years or Months) of Missing Inspection/Record	Number of Inspections Missed	Discrepancy lasted more than 10 days (Y or N)
6500010000 20"	726.29	N	Test Station	Missed Criteria	2018	1	Yes
6500030000 [1]	54.955	N	Test Station	Missed Criteria	2019	1	Yes
6900080000 BP TO OW	1.67	N	Test Station	Missed Criteria	2017	1	Yes
6900080000 BP TO OW	6	N	Test Station	Missed Criteria	2017	1	Yes

3. § 192.465 External corrosion control: Monitoring.

(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of § 192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.

Tallgrass failed to test each pipeline under cathodic protection at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of § 192.463. On November 18, 2020, Tallgrass provided a list that contained electrical test stations that were not tested at the required intervals for calendar years 2016-2019 for the following pipeline segments under cathodic protection:

Segment	Instances
651-001-00-00	4
700-001-00-00	4
700-004-00-00	1
700-001-00-00-BS-O	1
7000010000	4
7000010100	1
7000010200	4
6500010000 16"	9
6500010000 20"	4
6500010000 TGX	78
6500010000G-G	77
7000010000 16"	48
7000010000 H-L	4
7000010000 INACTIVE	11
2749	1
7000010000	2
700-001-00-00	29

Tallgrass failed to inspect multiple electrical test stations for multiple calendar years for total number of 282 missed inspections.

4. § 192.465 External corrosion control: Monitoring

(a)

(b) Each cathodic protection rectifier or other impressed current power source must be inspected six times each calendar year, but with intervals not exceeding 2½ months, to insure that it is operating.¹

Tallgrass failed to inspect six times each calendar year, but with intervals not exceeding 2½ months each cathodic protection rectifier. On November 18, 2020, Tallgrass provided a list of rectifiers that were not inspected in the required intervals to ensure that they were operating.

PHMSA System	Segment	Mile Post / Station	HCA (Y or N)	Identified Discrepancies? (Rectifier, Critical Bond, Non-Critical or Annual Reading)	Inspection not conducted in the required interval	Dates (Years or Months) of Missing Inspection	Sequence Missed
TIGT	6500010000 TGX	0+0054	N	Rectifier	Missed 2.5 Month Interval	2018	1
TIGT	1072	0	N	Rectifier	Missed 2.5 Month Interval	2017	1
TIGT	6900020000	95.7	N	Rectifier	Missed 2.5 Month Interval	2018	1
TIGT	6900020000	97	N	Rectifier	Missed 2.5 Month Interval	2018	1

5. § 192.465 External corrosion control: Monitoring.

(a)

(c) Each reverse current switch, each diode, and each interference bond whose failure would jeopardize structure protection must be electrically checked for proper performance six times each calendar year, but with intervals not exceeding 2 1/2 months. Each other interference bond must be checked at least once each calendar year, but with intervals not exceeding 15 months.

Tallgrass failed to electrically check for proper performance each reverse current switch, each diode, and each interference bond whose failure would jeopardize structure protection six times each calendar year, but with intervals not exceeding 2 ½ months. On November 18, 2020, Tallgrass provided a list critical bonds that were not inspected in the required intervals to insure proper performance.

¹ 49 C.F.R. § 192.465(b) was amended on January 11, 2021, 86 FR 2240. The inspection at issue was conducted prior to the amendment. As such, the language of § 192.465(b) that was in effect at the time of the inspection is used in this Notice.

Segment	Mile Post / Station	HCA (Y or N)	Identified Discrepancies? (Rectifier, Critical Bond, Non Critical or Annual Reading)	Missing Record or Inspection not conducted in the required interval	Inspection or Records	Dates (Years or Months) of Missing Inspection	Number of Inspections	Discrepancy lasted more than 10 days (Y or N)
7000020000	1441+53	N	Critical Bond	Missed 2.5 Month and 6 Readings/calendar year	Both	2017, 2019	7	Yes
65000100016"	36616+80	N	Critical Bond	Missed Calendar Year and 2.5 Month Interval	Both	2017, 2019	7	Yes
65000100020"	714.36	N	Critical Bond	Missed Calendar Year and 2.5 Month Interval	Both	2017, 2019	7	Yes
650001000TGX	36616+81	N	Critical Bond	Missed 2.5 Month Interval	Both	2019	1	Yes

6. § 192.481 Atmospheric corrosion control: Monitoring.

(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

If the pipeline is located: Then the frequency of inspection is: Onshore At least once every 3 calendar years, but with intervals not exceeding 39 months	
Pipeline type:	Then the frequency of inspection is:
(1) Onshore other than a Service Line	At least once every 3 calendar years, but with intervals not exceeding 39 months.
(2) Onshore Service Line	At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in paragraph (d) of this section.
(3) Offshore	At least once each calendar year, but with intervals not exceeding 15 months.

Tallgrass failed to inspect each pipeline or portion of pipeline that was exposed to the atmosphere for evidence of atmospheric corrosion at least once every 3 calendar years, but with intervals not to exceeding 39 months. PHMSA discovered that Tallgrass failed to inspect at the prescribed intervals the following two spans for atmospheric corrosion.

- For the Lingle to State Line (Station 1522+89) (42.101858°, -104.278414°) span, Tallgrass Corrosion and Operation teams were of an atmospheric corrosion inspection occurring at this location prior to 8/24/2020.

- For the Douglas Plant to Ogallala (Station 5543+75) (42.205382°, -104.514754) span, Tallgrass Corrosion and Operations team were unable to locate any documented record of an atmospheric corrosion inspection between 6/9/2009 and 8/24/2020.

Furthermore, after requesting records, on November 18, 2020, Tallgrass provided a list admitting that atmospheric corrosion inspections that were not conducted for Unit 15545 at 38 locations in 2017 and one location in 2019 at the required intervals in accordance with § 192.481.

7. **§ 192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (a) **General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.**

Tallgrass failed to follow its manual of written procedures for conducting operations and maintenance activities. Specifically, Tallgrass failed to follow OM1404_GL Title: Maps and Records Section 3.1 Minimum Requirements that states, “[a]t a minimum, the records maintained will include:...E) Pipeline attributes (OD [outside diameter], wall thickness, seam type, and pipe grade).” Through a PHMSA review of Tallgrass’s PODS Pipeline Data Model GIS database, it was determined that Tallgrass did not maintain required records for the Trenton Lateral pipeline which Tallgrass built in 2014. Specifically, Tallgrass stated to PHMSA that PODS is the official record keeping location for the construction data, but in PODS the Trenton Lateral pipeline had unknown wall thickness, seam type, grade, manufacturer and coating manufacturer. PHMSA also requested to view an alignment sheet or as-built drawing of the line to verify these material specifications. Tallgrass informed PHMSA that they did not have these records. Tallgrass provided PHMSA with a job book and an issued for construction drawing of the line. PHMSA was still unable to verify the pipe specifications. During the inspection Tallgrass performed material verification digs at 4 of the 5 locations on the Trenton lateral.

8. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Tallgrass failed to follow its manual of written procedures for conducting operations and maintenance activities. Specifically, Tallgrass failed to follow OM903_GL Title: External Corrosion Control for Buried or Submerged Pipelines Sec 3.5, states, “[t]est electrical isolation by comparing the casing-to-soil potentials to the matching pipe-to-soil potentials at least once each calendar year, not to exceed 15 months.” On November 18, 2020, Tallgrass provided a list of pipeline casings that were not inspected for electrical isolation for multiple years.

Segment	Mile Post / Station	HCA (Y or N)	Identified Discrepancies? (Rectifier, Critical Bond, Non Critical or Annual Reading)	Inspection not conducted in the required interval	Dates (Years or Months) of Missing Inspection/Record	Number of Inspection	Discrepancy lasted more than 10 days (Y or N)
7000020000	2564+24	N	Casing	Missed Calendar Year	2019	1	Yes
6500010000 TGX	36047+26	N	Casing	Missed Calendar Year	2018, 2019	2	Yes
6500010000G-G	640.977	N	Casing	Missed Calendar Year	2018	1	Yes
6500010000G-G	647.381	N	Casing	Missed Calendar Year	2017, 2018	2	Yes
6500010000G-G	653.6	N	Casing	Missed Calendar Year	2018, 2020	2	Yes
6500010000G-G	657.354	N	Casing	Missed Calendar Year	2018	1	Yes
7000010000 16"	5487+49	N	Casing	Missed Calendar Year	2019	1	Yes
7000010000 INACTIVE	277+10	N	Casing	Missed Calendar Year	2018, 2019	2	Yes
7000020100	1+63	N	Casing	Missed Calendar Year	2016	1	Yes
700-001-00-00	9587+27	N	Casing	Missed Calendar Year	2016	1	Yes
700-001-00-00	10016+10	N	Casing	Missed Calendar Year	2016	1	Yes

9. **§ 192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (a)
 - (b) ***Maintenance and normal operations.*** The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
 - (1)
 - (8) **Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found.**

Tallgrass failed to prepare and follow written procedures for maintenance and normal operations. Specifically, Tallgrass failed to periodically review the work done by the operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance. Tallgrass self-reported that one of its technicians in the Rocky Mountain Operating Region was not consistently capturing survey data or entering it into the Cathodic Protection Data Manager (CPDM) application. Additionally, the technician was not documenting justifications for why inspections were not performed since 2015. Tallgrass failed to periodically review the work done by the technician to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance until 2019 when a new Corrosion Supervisor was hired.

10. **§ 192.706 Transmission Lines – Leakage Surveys.**

Leakage surveys of a transmission line must be conducted at intervals not exceeding 15 months, but at least once each calendar year. However, in the case of a transmission line which transports gas in conformity with § 192.625 without an odor or odorant, leakage surveys using leak detector equipment must be conducted—

 - (a) **In Class 3 locations, at intervals not exceeding 7 1/2 months, but at least twice each calendar year;**

Tallgrass failed to conduct leak detection surveys using leak detector equipment in the case of a transmission line which transports gas, in conformity with § 192.625, without an odor or odorant. PHMSA reviewed Tallgrass' leak survey patrolling records for the years 2017 through 2019. Tallgrass documented that a Gas Alert Max XTII was utilized for leak surveys on Line Number 740-002-00-00, at Holyoke, Colorado, a non-odorized Class 3 location. Such a device is designed to be used for personal safety and is not an acceptable leak detector equipment for performing leakage surveys in accordance with § 192.706(a).

The *GasAlertMax XT II Technical Reference Guide* provides essential information for operating the GasAlertMax XT II gas detector. The introduction states, "[t]he GasAlertMax XT II gas detector ('the detector') warns of hazardous gas at levels above user-defined alarm setpoints." The guide concludes that this device is only "a personal safety device," and correspondence from the manufacturer, Honeywell, on March 29, 2020, states, "[t]he BW Max XT II Multi-Gas

Detector is a remote sampling device for personal monitoring as a preventive measure, it should not be used as a reactive and/or constant measure, such as below ground leak survey of steel pipelines.”

11. § 192.805 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a)

(h) After December 16, 2004, provide training, as appropriate, to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities;

Tallgrass failed to provide training to ensure that individuals performing leakage surveys have the necessary knowledge and skills to perform the leakage survey in a manner required by § 192.706. Procedures and records indicated that field personnel qualified by Tallgrass to perform leakage surveys were not instructed on the correct leak detector equipment capable of detecting leaks. For example, the OQ Training Curriculum for EWN Course # 80007 - Walking Gas Leakage Survey, Section 17 demonstrates Tallgrass’s incorrect OQ training showing improper equipment (an odorometer) as a leak detection device. This was done despite OQ Task Analysis for Leak Surveys - OQ Task 1201_G – Transmission Lines: Patrolling & Leakage Survey which acknowledged Tallgrass understood the importance and complexity of this qualification.

Tallgrass used two personal safety devices for leak surveys the GasAlertMax XT II and GX-2012 per the Pipeline Patrol/Leakage Survey Reports reviewed, but the equipment manuals state that these devices are for specific requirements and are for personal use or bar holing only. The manufacturer's user manual provides basic information to operate the GasAlertMax XT II gas detector. In the introduction, it states, "The GasAlertMax XT II gas detector (“the detector”) is designed to warn of hazardous gas levels above user-defined alarm set points. The detector is a personal safety device. “The manufacturer's user manual provides basic information to operate the GX-2012 gas detector. In the introduction is states, "[c]hoice of two operating modes: Normal Mode for typical confined space or area monitoring and Bar Hole Mode for checking of bar holes when searching for underground gas leaks." Neither of these is the proper application of conducting a leak survey on buried pipelines.

12. § 192.911 What are the elements of an integrity management program?

An operator's initial integrity management program begins with a framework (see § 192.907) and evolves into a more detailed and comprehensive integrity management program, as information is gained and incorporated into the program. An operator must make continual improvements to its program. The initial program framework and subsequent program must, at minimum, contain the following elements. (When indicated, refer to ASME/ANSI B31.8S (incorporated by reference, see § 192.7) for more detailed information on the listed element.)

(a) An identification of all high consequence areas, in accordance with § 192.905.

Tallgrass' integrity management program failed to identify pipeline segments and pipeline facilities in high consequence areas (HCAs) prior to calendar year 2020. The facilities have not changed in operational status, PIR distance or structure count since before 2020. Tallgrass personnel stated to PHMSA inspectors that prior to 2020, its process delineated that the integrity management rule stopped at the fence line of its facilities.

On March 1, 2020, Tallgrass enacted a gas facility integrity program, upon which it identified, for the first time, the following facility specific HCAs:

HCA ID	Description	GPS Coordinates
32957, 6686	Launcher/Receiver	38.857341, -94.535528
32613	Meter Station 15505	40.609884, -98.383295
32918	Meter Station 275651	41.961078, -103.926130
6751, 6835, 6837, 6846	Meter Station 274131, 37474	41.130121, -101.701523
8593	Meter 15034	40.876178, -97.883706
8518	Meter Station 8693, 9213, 9219	43.279043, -107.605815

Section 192.901 "prescribes minimum requirements for an integrity management program on any gas transmission pipeline covered under this part." Section 192.3 provides that "pipeline or pipeline system means all parts of those physical facilities through which gas moves in transportation, including, but not limited to, pipe, valves, and other appurtenance attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies." As such, pipeline facilities and segments are required to be included within HCA studies.

Proposed Civil Penalty

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed \$209,002 per violation per day, with a maximum penalty not to exceed \$2,090,022. For violations occurring prior to November 2, 2015, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a related series of violations. We have reviewed the circumstances and supporting documentation involved for the above probable violations and recommend that you be preliminarily assessed a civil penalty of \$359,900 as follows:

<u>Item number</u>	<u>PENALTY</u>
2	\$ 7,900
3	\$ 73,900
5	\$ 29,100
6	\$114,000
8	\$ 12,700
10	\$ 58,400
12	\$ 63,900

Warning Items

With respect to item 1, 4, and 7 we have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to promptly correct these items. Failure to do so may result in additional enforcement action.

Proposed Compliance Order

With respect to items 6, 9, 10, 11, and 12 pursuant to 49 U.S.C. § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to Tallgrass Interstate Gas Transmission, LLC. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Enforcement Proceedings*. Please refer to this document and note the response options. All material you submit in response to this enforcement action may be made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, or request a hearing under 49 CFR § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order. If you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from receipt of this Notice. This period may be extended by written request for good cause.

In your correspondence on this matter, please refer to **CPF 3-2021-043-NOPV** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A. Ochs
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Enforcement Proceedings

cc: Jennifer Eckles, Director Compliance, jennifer.eckels@tallgrassenergylp.com
Crystal Heter, Chief Operating Officer, crystal.heter@tallgrassenergylp.com
Brad Armsbury, Compliance Engineer, brad.armsbury@tallgrassenergylp.com

PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Tallgrass Interstate Gas Transmission, LLC (Tallgrass) a Compliance Order incorporating the following remedial requirements to ensure the compliance with the pipeline safety regulations:

- A. In regards to item 6 of the Notice pertaining to failing to inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at least once every 3 calendar years, but with intervals not to exceeding 39 months, Tallgrass must:
 - 1. Provide the Central Region director with a list of all the spans exposed to the atmosphere in the western district of the Rocky Mountain Operating Region and the associated atmospheric inspection records in within **60** days of receipt of the Final Order.
 - 2. Provide a procedure modification to the Central Region Director for approval to ensure complete atmospheric inspection are accomplished and records are maintained going forward within **60** days of receipt of the Final Order.

- B. In regards to item 9 of the Notice pertaining to Tallgrass failing to review the effectiveness and adequacy of procedures used in normal operation and maintenance activities per § 192.605(b)(8), Tallgrass must:
 - 1. Perform audits to examine its conformity with its operations and maintenance manual. The audit must be performed by personnel not involved in the work or the operations being audited. The evaluation method should also allow the operator to objectively determine the strengths and weaknesses of its personnel and processes that support each of the elements of the operations and maintenance manual, as well as areas needing improvement. Tallgrass shall provide a plan for approval to the Central Region Director identifying the audit criteria, scope, frequency, and methods used to assess the application of and conformance with its operation and maintenance manual within **90** days of receipt of the Final Order.
 - 2. Tallgrass shall provide response times for addressing identified findings of audits and evaluations within **1** year of receipt of the final order. The management responsible for the area being audited or evaluated shall ensure that findings are addressed within the defined response times.
 - 3. The results of internal audits and the status of corrective actions shall be reported in **bi-annual** reviews to the Central Region Director until closure of the compliance order.

- C. In regards to item 10 the Notice pertaining to Tallgrass failing to perform leak detection surveys using leak detector equipment that is effective and appropriate in the case of a transmission line which transports gas in conformity with § 192.625 without an odor or odorant, Tallgrass must:
 - 1. Identify and provide a list to the Central Region Director of all the unodorized class 3 locations that have utilized insufficient leak detection equipment within 60 days of receipt of the Final Order.
 - 2. Ensure all unodorized pipelines in class 3 locations receive a leak survey

utilizing leak detection equipment that is designed and calibrated to identify leaks on underground pipelines.

- D. In regards to item 11 of the Notice pertaining to Tallgrass failing to provide training to ensure that individuals performing leakage surveys have the necessary knowledge and skills to perform the leakage survey in a manner required by § 192.706, Tallgrass must develop and implement training to ensure that personnel are equipped with the knowledge of using the appropriate leak detection equipment for relevant tasks within **90** days of receipt of the Final Order.
- E. In regards to item 12 of the Notice pertaining to Tallgrass failing to identify pipeline segments in high consequence areas including pipeline facilities prior to calendar year 2020, Tallgrass must:
 - 1. Provide plan for approval to Central Regional Director within 90 days of receipt of the Final Order, showing how all facilities will be evaluated to determine if they are contained within a HCA.
 - 2. Complete a natural gas HCA facility determination form for all of the facilities. Documentation must provide the date completed and result of the study for approval by the Central Regional Director. Finally, all HCAs identified must be implemented into the Integrity Management Plan within 6 months of the Final Order.

It is requested that Tallgrass Interstate Gas Transmission, LLC maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Gregory A. Oches, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.