



August 31, 2022

Via Certified Mail and E-Mail to: Gregory.Ochs@dot.gov

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

Re: *Response to CPF 3-2022-001-NOPV (August 8, 2022)*
Audit Dates: April 27-30, 2021

Dear Director Ochs:

This responds to the above-referenced Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order. Continental Resources is not contesting the Notice of Probable Violation or Proposed Civil Penalty. Continental is providing, with this response, additional information, and materials that we believe may warrant modification of the proposed compliance order.

The proposed compliance order provides Continental with a certain number of days to rectify two noted deficiencies: (1) 180 days to install warning devices in the LACT buildings associated with its PHMSA-regulated facility; and (2) 180 days to properly pressure test its PHMSA-regulated pipeline. The proposed compliance order also requests Continental document the safety improvement costs of fulfilling the order. However, Continental already installed the necessary warning devices in September 2021, amended its procedures to ensure the proper hydrostatic testing procedure, and obtained one of the necessary pressure tests of its pipeline in May 2022. Attached are the invoices for the work, the updated procedure, and the May 2022 Hydrostatic Test Report. The total cost for these activities was approximately \$23,860.91. Continental is in the process of scheduling the remaining pressure testing for the station piping that was referenced in the Notice of Probable Violation and expects to have that testing completed in the near future.

As mentioned above, Continental is not contesting the Notice or proposed penalty. Further, we understand PHMSA may still wish to issue a Compliance Order to Continental but wanted to provide you with the information and evidence showing that it has already completed many of the actions required by the proposed order, and the remainder are in process.

Very truly yours,

Brooks A. Richardson
Vice President & Deputy General Counsel
Continental Resources, Inc.

Enclosures

Mr. Gregory Alan Ochs

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cc: Patrick McGrew, Senior HSE Specialist, Continental Resources
Darrell Stockton, Manager, Measurement – Facilities and Projects
Brad Aman, Vice President – Facilities and Projects