

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: jimmy.staton@southernstar.com and craig.thomas@southernstar.com

April 28, 2022

Mr. Jimmy Staton
President/CEO
Southern Star Central Gas Pipeline, Inc.
4700 State Route 56
Box 20010
Owensboro, KY 42301

CPF 3-2022-044 NOA

Dear Mr. Staton:

From October 18 to November 8, 2021, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Southern Star Central Gas Pipeline, Inc.'s (Southern Star) Control Room Management (CRM) procedures and records in Owensboro, Kentucky.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Southern Star's plans or procedures, as described below:

1. **§ 192.631 Control room management.**
 - (a) **General.**
 - (1) **This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...**

Southern Star's CRM Procedure was inadequate to provide a process for determination of a control room. Procedure 40.18.00.08, Control Room, and SCADA Access Policy Procedure Section 2.1.2 stated, "No other control rooms exist on the pipeline that are able to send remote commands to control field equipment, acknowledge alarms alerting individuals of certain

conditions, or any other type of control room actions as defined under SSCGP procedure 40.01.01, 'Roles and Responsibilities During Normal Operations,' or 40.01.02, 'Roles and Responsibilities During Abnormal/Emergency Operations.'" While the operator provided criteria for control room determination, they did not provide a process to assess current and new facilities.

The procedure must be amended to include a process and criteria to consistently determine if the facility is capable of independently controlling and monitoring assets rendering the facility a control room.

2. § 192.631 Control room management.

(a) *General.*

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section *Roles and responsibilities*. Each operator must define the roles and responsibilities of a controller during normal, abnormal and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

Southern Star's CRM procedure was inadequate because it did not define Primary Controller and Secondary Controller positions. It also did not define the independent roles and responsibilities of these positions when they are operating on the same shift and on different consoles as required by § 192.631(b). There was a lack of definition for the role of Primary and Secondary during shift change. Procedure 40.01.01 identified various tasks performed by the controllers and stated "[W]hen multiple controllers are on the console, one (1) controller shall be responsible for this task." It also stated, "[A]ll tasks can be performed from any of the three consoles[.]" Section 6.1 of Procedure 40.14.01 also mentioned a secondary controller and "lead controller role." Since there were three consoles in the control room, and all consoles had identical capabilities, the procedure did not disallow anyone outside the Primary Controller to operate, monitor, and take action on the system. It is unclear if the Secondary Controller could send set points, acknowledge alarms or coordinate with field personnel. If the Second Controller has such authority, it was not clear when this was allowed.

The procedure needs to be amended to define the various controller levels and their related roles, responsibilities and authority when two controllers are on shift at independent consoles.

3. § 192.631 Control room management.

(a) *General.*

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1)

(4) A method of recording controller shift-changes and any hand-over of responsibility between controllers;

Southern Star's procedure 40.11.01.15 was inadequate in providing a method of recording shift-changes as required per §192.631(b)(4). While the procedure provided an extensive list of items to discuss during shift change, it did not provide instruction on how to consistently incorporate the discussion points, from the procedure, into the shift change form. Also missing from the procedure was the expectation of what was to be covered when the alarm box section on the form is checked, who was responsible to develop and prepare the shift change form, who was responsible to receive the shift change, how abnormal operations were identified within the form, what is the meaning of the TRUE/FALSE and YES/NO identifiers, and when/how a notation was taken off the form. Where information did not fit within the categories specified on the form, the procedure did not explain how to enter it. For example, weather forecasts, SCADA communication concerns, pigging and third-party incidents.

The procedure needs to be amended to provide a method of recording shift changes with instruction to consistently incorporate the discussion points from the procedure.

4. § 192.631 Control room management

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(5) The roles, responsibilities and qualifications of others with the authority to direct or supersede the specific technical actions of a controller.

Southern Star's procedures were inadequate to define the roles, responsibilities and qualifications of others with the authority to direct or supersede the specific technical actions of a controller as required by §192.631(b)(5).

The operator's procedure Section 1.3 of policy 40.01.00.02 stated, "[Q]ualified control room supervision and management can invoke the authority to direct or supersede the specific technical actions of a controller in control of the pipeline." Procedure 40.01.01.15 stated in a note box, "[O]perator gas qualified Gas Control leadership (Manager/Leader) has the authority to supersede a controller." The qualification is not specific, but assumed to be controller qualified. Missing from the procedure was definitions for supersede and direct. These words

were used synonymously, but while similar are not equal. Additionally, the training documents for this issue stated, "[S]outhern Star has determined that the only people who have the authority to tell a gas controller what he must do are themselves, OQ (operationally qualified) controllers." This conflicts with procedures. This was substantiated during the controller interview, when the controller responded to the question, "Who can direct or supersede a controller?" with, "any qualified controller can supersede or direct another controller."

The procedure did not provide the conditions of how and when a person with supersede authority implements their authority. The procedure described actions for the controller when the superseder individual intervened: "[I]f an individual with Supersede authority directs a controller's actions the controller must fully understand the directive." The procedure included what was to occur once the directive was given: "[I]f the controller does not understand or disagrees with the directive and it becomes a Supersede event, the controller should note electronically describing the Supersede event." The procedure left the documentation choice to the controller, rather than prescribe how this event was to be documented for future inspection or review.

The procedure needed to be amended to define the roles and responsibilities for those authorized to supersede the actions of a controller, as well as the controller when that occurs. Additionally, the training needed to be amended to be consistent with the procedure.

The operator provided amendments to procedures that satisfactorily addressed the issues in this item. Additionally, the training document was amended 01/25/2022 to be consistent with the procedure regarding who can direct or supersede the technical actions of a controller. No further action required for this specific requirement.

5. § 192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(1) Implement sections 1, 4, 8, 9, 11.1 and 11.3 of API RP 1165 (incorporated by reference, see §192.7) whenever a SCADA system is added, expanded or replaced, unless the operator demonstrates that certain provisions of sections 1, 4, 8, 9, 11.1 and 11.3 of API RP 1165 are not practical for the SCADA system used.

Southern Star's procedure was inadequate because it did not define SCADA system additions, expansions or replacements when the stated sections of API 1165 must be implemented as required by §192.631(c)(1).

Procedure 40.05.01.05 stated, “[A]ny SCADA system addition, expansion, or replacement (vendor change, acquisitions, or mergers) will require implementation of API RP 1165.” Section 6.1.2 of the procedure added, “[R]outine upgrades, such as SCADA version upgrades, SCADA hardware changes, or any other SCADA system changes, will be verified that the scope of the SCADA change did not impact display parameters and does not require API 1165 implementation.” These examples were vague and broad based. For example, changing like for like equipment for maintenance would require implementation of the required sections of API 1165. Also, there was no process defined for verification of compliance with the required sections of API 1165.

The procedure needs to be amended to define SCADA system additions, expansions or replacements with examples of each. Amendments to the procedure must also include the process to verify compliance with sections 1, 4, 8, 9, 11.1 and 11.3 of API 1165.

6. § 192.631 Control room management.

(a) *General.*

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(c) *Provide adequate information.* Each operator must provide its controllers and with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(1) ...

(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment of SCADA displays;

Southern Star’s procedure 40.12.02.08 failed to provide a process to provide thorough point-to-point verifications as required by §192.631(c)(2). Procedure 40.12.02.08 section 4.1.2 did not account for verification of calculated points in SCADA. Instructions to complete the verification form were inadequate as evidenced by records review. The form utilized for documentation was not complete. Missing were as-found/as-left, the field person was not identified, and verification of SCADA tag to end device was missing, as well as verification of all screens for points.

Section 4.1.5 allowed the controllers to adjust the set point pressure to allow for an analogue value to cross the alarm threshold rather than test the set point at the established correct and verified set point value.

The procedure needs to be amended to include all safety related points including calculated points as well as instructions to complete the form and additional verification and documentation requirements. It also must disallow changing the set point value for testing purposes and test to the established set point value in SCADA.

7. § 192.631 Control room management.

(a) *General.*

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(c) *Provide adequate information.* Each operator must provide its controllers and with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(1)

(3) Test and verify an internal communication plan to provide adequate means of manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months.

Southern Star's procedure was inadequate because they did not have a detail plan that defines their practice when they test the manual operation of the pipeline during a SCADA failure/outage. There was a document with all facilitates identified that is used to document and track flows and pressures on the system. This document is not referenced in the procedure. Section 7.0 of Procedure 40.08.01.06 provided a detail test plan that is instructive for testing.

The procedure needs to be amended to provide a detailed plan to manually operate the system safely as well as a process to test the plan.

8. § 192.631 Control room management.

(a) *General.*

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(d) *Fatigue mitigation.* Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:

(1)

(2) Educate controllers and supervisors in fatigue mitigation strategies and how off-duty activities contribute to fatigue;

(3) Train controllers and supervisors to recognize the effects of fatigue;

Southern Star's procedures were inadequate because they did not proceduralize its practice of supervisors completing periodic refresher fatigue education training every 36 months. There is also additional fatigue training, completed by controllers, that is not being documented in the operator's Learning Management System (LMS).

The procedure needs to be amended to include the practice requirement of supervisor refresher fatigue training as well as to capture and record all fatigue training provided to controllers and supervisors.

9. § 192.631 Control room management.

(a) *General.*

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(e) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1)

(6) Address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section.

Southern Star's procedures were inadequate to provide a process and tools to track inaccurate, malfunctioning and out of service field equipment to identify, report and promptly correct issues.

Section 9.6.1 of procedure 40.12.01.17 provided a table for alarm remediation time based on alarm priority. Section 9.1.1 of the same procedure stated, "[I]dentify and correct inaccurate or malfunctioning alarms by use of the following processes[.]" followed by a list of alarm reports that were available to run for review on a periodic or ad hoc basis. This is a high-level process managed by leadership and does not address how the controller handles inaccurate, malfunctioning, or stale alarms. Section 9.1.5.2 stated, "[B]ogus/unreliable data displayed in SCADA will be reported by the controller as it occurs through email or phone." Section 9.1.6.2 stated, "[E]nsure any deficiencies not corrected in the prioritized timeframe are evaluated for priority and risk by Gas Control Management."

Emails and phone calls were communication methods for controllers to report malfunctioning or inaccurate alarms or other deficiencies, but how those issues were collected, documented and tracked to ensure compliance with the table in section 9.6.1 is missing from the procedure. The monthly and ad hoc reports may provide additional information, and some of the reports identified in section 9.1.1 could have provided insight into deficiencies, but not without review of other information and if the deficiency was corrected. Also, the remediation times in section 9.6.1 were not "prompt," considering that critical alarm priority "critical" remediation was 14 days and high, medium and low were 30 days.

This issue was further evidenced upon review of controller shift change documents, which were developed from controller logs. Several instances noted by controllers that the field personnel told them to "ignore" the alarm for a variety of reasons. This was not an acceptable practice. Effective alarm handling includes inhibiting, taking off scan and forced or manual points or values, thus the reporting requirement in §192.631(e)(2), to manage these conditions. Controllers should never be in a position to ignore alarms. While the procedure provided who can and cannot take points off-scan, inhibit alarms or place points in manual or forced conditions, it does

not provide when this action may be appropriate. It did describe conditions in 12.1.1 that such conditions require a Management of Change.

The procedure needs to be amended to include a process to provide a method and tools to report, document, track, review and promptly correct deficiencies identified in through the implementation of paragraphs (e)(1) through (e)(5) of this section. This must include the roles and responsibilities for reporting, documenting, tracking, reviewing and correcting these deficiencies. The procedure also needs to include appropriate considerations when points affecting safety should be taken off-scan, have alarms inhibited or points and alarms place in forced or manual. Where appropriate, the procedure must include language discouraging or disallowing alarms to be ignored.

10. § 192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(e) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1) ...

(2) Identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities.

Southern Star's procedure was inadequate because while it defined the reports to be gathered, it did not provide how the information collected will be analyzed, verified, documented and address deficiencies. The procedure assigned the Manager or Designee responsible for this task, but did not define who else in engaged in the review. There were no Key Performance Indicators (KPI) to determine criteria for success or how they would report compliance with their procedure 9.6.1 in section 40.12.01.17.

The procedure needs to be amended to include the process for what information will be evaluated, analyzed, reviewed and documented. KPIs need to be developed and established for criteria to indicate performance of alarm management. The procedure also needs to include who is responsible (individual or team) for the process. This process must connect to the alarm tracking process identified in Item 9.

11. § 192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline

facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(e) Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1)

(3) Verify correct safety-related alarm set-point values and alarm descriptions at least once each calendar year, but at intervals not to exceed 15 months;

Southern Star's procedure is inadequate to determine the correct alarm set-point as required by § 192.631(e)(3). The operator stated there was a process to rationalize alarms, but the operator abandoned that solution and moved to TiPS Logmate, a third-party alarm management tool/application. The operator was in the process of using this application to re-rationalize all alarms with an Alarm Team. Procedure 40.12.01.13 was very high level and did not thoroughly define the metric related to severity, impact and response time to establish priority and set point for safety related alarms.

The procedure needs to be amended to define the process using the operators selected tool to rationalize alarms consistently and thoroughly. The procedure must include metrics related to severity, impact and response time for alarm conditions to establish priority and set points for safety related alarms. The priorities must be consistent with the established priorities in the Alarm Management Plan.

12. § 192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(e) Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1)

(5) Monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not to exceed 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms;

Southern Star's procedure 40.12.01.13 was inadequate to provide a process to identify all tasks performed by controllers and methods for measuring the content and volume of general activity being directed to an individual controller. The process is detailed in Appendix B, but this was not referenced in the procedure. The background information of hourly controller activity documentation, used to produce the summary, was not required to be maintained as needed to

support summary results. The procedure did not accommodate refreshing the task list as control room activities can change over time.

The procedure needs to be amended to include a method to identify all tasks/work activity performed by the controller as well as a path to review the task list and update as needed. All documents related to the review must also be documented and maintained as part of the record that was used to measure the content and volume of general activity being directed to an individual controller.

13. § 192.631 Control room management.

(a) *General.*

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(f) *Change Management.* Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing each of the following:

(1) Establish communications between control room representatives, operator's management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration;

(2) Seek control room or control room management participation in planning prior to implementation of significant pipeline hydraulic or configuration changes.

(3) Seek control room or control room management participation in planning prior to implementation of significant pipeline hydraulic or configuration changes.

Southern Star's procedures are inadequate because they do not address all the elements that may impact control room operations through the process of defining how changes will be coordinated with the control room and how those changes will be incorporated and implemented in the control room as required by §192.631(f)(1) and §193.631(f)(3).

Southern Star did not have an overarching change management process for the company. They entered projects into the Enterprise Project Management System. This system was primarily used to track projects. The control room used it to keep updated on projects that may affect them and system operations from a system planning perspective.

Information about changes that may affect control room operations are provided during a weekly Projects Update Conference call. Gas Control personnel provided comments to any projects that have potential to impact control room operations. Documentation of this weekly meeting including attendees and items discussed are recorded and available from project management. Procedure 40.15.01.12 section 3.1.1 provided examples of changes that have the potential to affect control room personnel. While this is important, the language of §192.631(f) states, "[C]hanges that could affect control room operations." Section 7.1.2 requires a Management of Change (MOC) be completed for "any SCADA display changes or changes that could directly or indirectly affect the hydraulic performance or configuration of the pipeline," and section 12.2.2

of procedure 40.12.01.17 requires a Management of Change (MOC) for alarm additions, removal, inhibiting and set point changes; off-scan, manual and forced and not included.

Several MOC's were reviewed during the inspection. It became apparent that the MOC was primarily being used as a communication tool of changes to the controllers, which is an important element of the MOC process. Verification that all elements that could impact the control room were being addressed through the MOC was missing. An example is MOC 484, 476, 485 all related to the Welda to Ottawa 36-inch line where the old line was being retired after a new line installed. During the inspection it appeared the pressure exceeded MAOP. Upon investigation, the field said the numbers were "bogus" and to ignore the information. On 10/22/2021, during the inspection, an MOC was written to inhibit these alarms. This issue of ignoring alarms was previously addressed in Item 9 of this document. An MOC procedure should consider all groups, elements, procedures, training and systems impacted by a change.

There is a commissioning process, inside the project management process, where SCADA gets notified of required changes. This commissioning process is not detailed in the procedure.

The procedure needs to be amended to detail the commissioning process and consider how the MOC will be used to make sure a more in-depth look at how the change will affect control room operations. Additionally, the MOC process should be all encompassing to evaluate how any change can affect the control room, even if the initiation of the change doesn't start with the commissioning process. The process must also address the controller training and communication elements.

14. § 192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(g) Operating experience. Each operator must assure that lessons learned from its operating experience are incorporated, as appropriate, into its control room management procedures by performing each of the following:

(1) Review incidents that must be reported pursuant to 49 CFR part 191 to determine if control room actions contributed to the event and, if so, correct, where necessary, deficiencies related to:

(i) Controller fatigue;

Southern Star's procedures were inadequate because they did provide a process to evaluate whether controller fatigue contributed to an event for incidents that must be reported pursuant to 49 CFR part 191 as required by § 192.631(g)(1)(i).

The operator provided a form, SSCGP Emergency Response Evaluation Form B, for control room incident investigation. The form was not referenced within the company procedures and there was not a methodology/instruction to demonstrate consistency in the completion of the

form. Also missing from the procedure was criteria for when this form must be used with the emergency response investigation procedures and how the requirements of § 192.631(g)(1) are to be completed.

The procedure must be amended to reference the SSCGP Emergency Response Evaluation Form B and provide guidance on when and how to complete the form.

The operator did provide amended forms that include a structure to evaluate controller fatigue and the control room requirements in § 192.631(g)(1). References to procedure modifications were not provided.

15. § 192.631 Control room management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(h) Training. Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator...

Southern Star's Gas Control Training Procedure 40.14.01.16 was inadequate because it did not include the documentation used to validate completion of all required training courses and assessments of controller progress to verify the controller was progressing through the training program. Also, any evaluator of controllers for operator qualification needs to be a qualified evaluator. This was also missing from the procedure.

The procedure needs to be amended to include the training completion and assessment forms and documents, as well as the requirement to retain these documents for review and inspection. The procedure also needs to include the operator qualification (OQ) requirement for the Gas Controllers.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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. Be advised that all material you submit in response to this enforcement action is subject to being 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, revised procedures, or a request for a hearing under § 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 an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested that Southern Star maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Gregory A. Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2022-044 NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

cc: Thomas Craig, Manager Integrity Management & PHMSA Compliance,
craig.thomas@southernstar.com

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings