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June 13, 2019

MS. Mary L. McDaniel, P.E.
Director, Southwest Region PHMSA
8701 S. Gessner, Suite 630
Houston, TX 77074

Re: CPF 4-2019-1006

Dear. MS. McDaniel:

Crestwood Midstream LLC is in receipt of the above referenced Notice of Probable Violation (NOPV) and Proposed Compliance Order (PCO), dated May, 17, 2019 for Tres Palacios. This letter constitutes Crestwood's timely response to Item 2 identified within the "Notice of Probable Violation" and "Proposed Compliance Order".

NOPV Item 2: §192.631(b)(4) Control Room Management

(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:

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

Tres Palacios failed to provide documentation for shift change per Tres Palacios written CRM Manual, Section 204 R&Rs-Shift Change Information and Accountability [192.631(b)(4)] for the following days: February 22-31, 2018; March 8-14, 2018 and August 13, 2018; in the shift change process (POEMS).

Response to NOPV Item 2:

On November 14, 2018, "shift change responsibility handover" training was conducted with controllers, exhibiting examples of deficiencies with shift change responsibilities inconsistent with our procedures and regulatory requirements. Discussion of deficiencies discovered, references to company procedures, and regulatory requirements were part of the training. (Reference Attachment "Training Shift Handover")

Additional documentation provides random samples of "shift change handover" showing dialog between controllers at 0600 hours and 1800 hours for random dates between February 13, 2019-April 12, 2019, sampling all four (4) controllers. The "Log Entries" provided in this spreadsheet had to be extracted from two separate reports from POEMS, again providing random dates. (Reference Attachment "Log Entries Report")



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Safety Improvement Costs:

It is requested (not mandated) that Tres Palacios Gas Storage, LLC maintain documentation of the safety improvement cost associated with fulfilling this Compliance Order and submit the total to Mary L. McDaniel, Director, Southwest Region, Pipeline and Hazardous Material Safety Administration. It is requested that the cost 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.

Response to Safety Improvement Costs:

Crestwood experienced no additional cost for the training conducted with Tres Palacios controllers other than normal cost of personnel time.

Conclusion:

Please do not hesitate to contact our office should you have any questions, or require any further information in connection with the above. Crestwood welcomes the opportunity to discuss this response with PHMSA if further clarification is required.

Sincerely,

Michael D. Smith

Michael D. Smith
Senior Pipeline Compliance Advisor, HSER

Cc: Robert "Daubs" Thompson, IV, Vice President, Associate General Counsel
Victoria Wagner, Vice President, HESR
David Hayden, Vice President, Storage and Transportation
Sean Sleight, Facility Manager, Tres Palacios
Alice Ratcliffe, Director, Pipeline Compliance, HESR

Attachments:

- Training Shift Handover
- Log Entries Report

CRM Training

11/14/18

Shift Handover and Documenting Work in POEMS

Procedures are satisfactory.

On November 11-13, 2018, a review was conducted of the POEMS shift change-over/hand-over data entry. Based on this review of the POEMS system from January 2018 through September 2018 the following deficiencies were discovered and training to address those deficiencies was conducted:

1. Log out entry for end of shift: Controller ending shift not logging on at time of shift change, indicating working longer hours than a normal shift.
2. Log in entry for begin of shift: Controller beginning shift not logging in at time of shift change, logging in one or two hours later indicating that no controller was on the console for that time period.
3. Entering key information discussed at time shift change to oncoming controller
4. In the event that a controller fails to log out, on-coming shift controller must log on under "temporary" status, and making detailed notes to the circumstances why logging in under temporary status.

No test was administered for the training provided. Examples mentioned above regarding log-in/log-out were discussed with reference to procedures/requirements for log-in and log-out. Fatigue was not determined to be a factor for issues as described above.

Signed: _____

Date: _____

11-14-18



operations

CRESTWOOD

FACE TO FACE TRAINING COURSE ROSTER

Course Name: *Safety Meeting*

Location: *Geo*

Date: *11/14/2018*

Begin Time: *7:00*

Instructor: *Cathy Tyler*

add PhmsH

newwood

shift change, log in/log in

YES, Test or Quiz Given

NO, Test or Quiz

Date delivered to

FWO HSERR:

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End Time: *8:00*

*Please place tests in order when turned in.

	Name of Participant: (please print)	Participant Signature	Manager/Supervisor	Advisor TEST Con.	Tech Test Con.
1	RONNIE TICKETT	<i>[Signature]</i>	S. SLEIGH		
2	Lee P. Hanna	<i>[Signature]</i>	S. Sleigh		
3	Zack Webernich	<i>[Signature]</i>	S. Sleigh		
4	Shelly Maston	<i>[Signature]</i>	S. Sleigh		
5	Luke Crane	<i>[Signature]</i>	S. Sleigh		
6	Felix P. Munoz II	<i>[Signature]</i>	S. Sleigh		
7	Sean Sleigh	<i>[Signature]</i>	S. Sleigh		
8	Louis Longoria	<i>[Signature]</i>	David Dryden		
9	Trge Cruz	<i>[Signature]</i>	Sean Sleigh		
10	Michael Smith	<i>[Signature]</i>	Sean Sleigh		
11	Dale Golemen	<i>[Signature]</i>	Alice Ratcliff		
12			Alice Ratcliff		
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Event Time	Log Type	Title	Entered By	Comments
04/12/2019 17:35:37.000	Shift Hand over	Start shift	Louis Longoria	
04/12/2019 17:29:04.000	Shift Hand over	End shift	Zack Webernich	
04/12/2019 05:55:36.258	Shift Hand over	Start shift	Zack Webernich	Relief with Louis; TGP having pressure issues; everything ran good last night; Unit 301 on a boost; Units 302, 303, 304 on injection into Cavern 1
04/12/2019 05:54:28.695	Shift Hand over	End shift	Louis Longoria	
04/11/2019 18:11:09.236	Shift Hand over	Start shift	Louis Longoria	Made relief with Zack; Unit 301 on a boost; Units 302, 303, 304 on injection into Cavern 1; Enerflex is working on the north gas cooler on 305.
04/11/2019 18:08:56.564	Shift Hand over	End shift	Zack Webernich	
04/11/2019 05:49:24.417	Shift Hand over	Start shift	Zack Webernich	Relief with Lee H; Unit 301 on a boost; all other Units on injection into Cavern 1; no issues; all customers flowed all night.
04/11/2019 05:48:22.901	Shift Hand over	End shift	Lee Hanna	
04/10/2019 18:16:45.125	Shift Hand over	Start shift	Lee Hanna	
04/10/2019 18:09:09.952	Shift Hand over	End shift	Trae Cruz	
04/10/2019 06:11:44.941	Shift Hand over	Start shift	Trae Cruz	
04/10/2019 06:11:12.642	Shift Hand over	End shift	Lee Hanna	
04/05/2019 18:19:50.456	Shift Hand over	Start shift	Lee Hanna	
04/05/2019 18:15:34.143	Shift Hand over	End shift	Trae Cruz	

04/05/2019 06:10:02.210	Shift Hand over	Start shift	Trae Cruz	
04/05/2019 06:04:33.787	Shift Hand over	End shift	Lee Hanna	
04/04/2019 18:11:26.894	Shift Hand over	Start shift	Lee Hanna	
04/04/2019 18:01:13.033	Shift Hand over	End shift	Trae Cruz	
04/04/2019 07:29:27.233	Shift Hand over	Start shift	Trae Cruz	Reviewed current operations with Lee Hanna. Running all 5 units injecting into all 3 caverns; 302 rpms are swinging; ran 303 on pipeline suction most of the night then swapped to cavern suction around 4 AM due to Gulf south's pressure; Fought Gulf South and Tejas's pressure all night - Rob is aware; 305 uses a lot of compressor oil - keep an eye on the bullseye sight glass; 303 cylinder #3 suction valve unloaders are currently disabled - the air is plugged off - remind Ronnie - in 1st stage steps above 9 are unaffected - 2nd stage 11-15 are unaffected
04/04/2019 06:16:57.349	Shift Hand over	End shift	Lee Hanna	
04/03/2019 22:49:44.446	Shift Hand over	Start shift	Lee Hanna	Gulf South's pressure came up too high trying to get into the A line and they had to shut down compression. Switched 303 back over to cavern-to-cavern 2nd stage and put Gulf South back on the B line.
04/03/2019 19:54:47.703	Shift Hand over	End shift	Louis Longoria	
04/03/2019 06:20:13.821	Shift Hand over	Start shift	Louis Longoria	Made relief with Lee Hanna; Running unit 301 on a boost and Units 302, 303, 304, and 305 injecting into all 3 caverns
04/03/2019 06:19:04.290	Shift Hand over	End shift	Lee Hanna	
03/29/2019 18:01:49.169	Shift Hand over	Start shift	Lee Hanna	

03/29/2019 17:59:51.418	Shift Hand over	End shift	Louis Longoria	
03/29/2019 06:01:39.232	Shift Hand over	Start shift	Louis Longoria	
03/29/2019 05:59:52.764	Shift Hand over	End shift	Trae Cruz	
03/28/2019 18:31:22.439	Shift Hand over	Start shift	Trae Cruz	
03/28/2019 17:58:12.764	Shift Hand over	End shift	Louis Longoria	
03/28/2019 06:11:35.211	Shift Hand over	Start shift	Louis Longoria	
03/28/2019 06:10:24.742	Shift Hand over	End shift	Trae Cruz	
03/27/2019 18:33:28.372	Shift Hand over	Start shift	Trae Cruz	
03/27/2019 18:33:07.715	Shift Hand over	End shift	Louis Longoria	
03/27/2019 06:44:15.688	Shift Hand over	Start shift	Louis Longoria	
03/27/2019 06:43:28.907	Shift Hand over	End shift	Trae Cruz	
03/22/2019 18:12:32.324	Shift Hand over	Start shift	Trae Cruz	
03/22/2019 17:59:31.838	Shift Hand over	End shift	Lee Hanna	
03/22/2019 06:04:51.672	Shift Hand over	Start shift	Lee Hanna	
03/22/2019 06:04:06.031	Shift Hand over	End shift	Trae Cruz	

03/21/2019 18:16:55.032	Shift Hand over	Start shift	Trae Cruz	Printed facility summary
03/21/2019 18:16:38.610	Shift Hand over	End shift	Lee Hanna	
03/21/2019 06:13:06.400	Shift Hand over	Start shift	Lee Hanna	Reviewed current operations with Louis and I accept shift. Currently running units 301 and 303 on a boost and unit 304 injecting into cavern 2; all customers on rate, NGPL batched in their Nom yesterday; No issues to report; Snubbing at cavern 1
03/21/2019 05:53:54.741	Shift Hand over	End shift	Louis Longoria	
03/20/2019 18:06:28.335	Shift Hand over	Start shift	Louis Longoria	Running units 301and 302 on a boost and units 302 and 304 injecting into cavern 3
03/20/2019 18:04:14.601	Shift Hand over	End shift	Zack Webernich	
03/20/2019 05:50:24.820	Shift Hand over	Start shift	Zack Webernich	Relief with Louis; unit is locked out and blown down; unit 301, 304 injecting into caverns 2 and 3; unit 303 on a boost; TGP had top cut back; no issues last night
03/20/2019 05:41:30.463	Shift Hand over	End shift	Louis Longoria	
03/20/2019 03:17:04.216	Shift Hand over	Start shift	Louis Longoria	Computer locked up - had to reboot the computer
03/20/2019 03:16:06.919	Shift Hand over	End shift	Louis Longoria	
03/15/2019 17:57:04.559	Shift Hand over	Start shift	Louis Longoria	
03/15/2019 17:31:13.928	Shift Hand over	End shift	Zack Webernich	
03/15/2019 06:03:20.782	Shift Hand over	Start shift	Zack Webernich	
03/15/2019 05:23:29.275	Shift Hand over	End shift	Louis Longoria	

03/14/2019 17:54:35.833	Shift Hand over	Start shift	Louis Longoria	
03/14/2019 17:52:58.786	Shift Hand over	End shift	Zack Webernich	
03/14/2019 05:56:03.084	Shift Hand over	Start shift	Zack Webernich	
03/14/2019 05:51:56.615	Shift Hand over	End shift	Louis Longoria	
03/13/2019 18:41:12.261	Shift Hand over	Start shift	Louis Longoria	
03/13/2019 18:39:59.464	Shift Hand over	End shift	Trae Cruz	
03/13/2019 07:51:44.084	Shift Hand over	Start shift	Trae Cruz	
03/13/2019 05:51:22.237	Shift Hand over	End shift	Louis Longoria	
03/08/2019 18:30:13.250	Shift Hand over	Start shift	Zack Webernich	
03/08/2019 18:29:10.359	Shift Hand over	End shift	Trae Cruz	
03/08/2019 06:58:44.571	Shift Hand over	Start shift	Trae Cruz	
03/08/2019 05:56:58.585	Shift Hand over	End shift	Zack Webernich	
03/07/2019 18:24:34.382	Shift Hand over	Start shift	Zack Webernich	
03/07/2019 18:15:22.169	Shift Hand over	End shift	Trae Cruz	
03/07/2019 06:03:50.642	Shift Hand over	Start shift	Trae Cruz	

03/07/2019 06:03:30.361	Shift Hand over	End shift	Lee Hanna	
03/06/2019 17:42:16.277	Shift Hand over	Start shift	Lee Hanna	
03/06/2019 17:36:27.886	Shift Hand over	End shift	Louis Longoria	
03/06/2019 05:55:43.951	Shift Hand over	Start shift	Louis Longoria	
03/06/2019 05:48:42.559	Shift Hand over	End shift	Zack Webernick	
03/01/2019 18:43:27.246	Shift Hand over	Start shift	Zack Webernick	
03/01/2019 18:42:25.336	Shift Hand over	End shift	Louis Longoria	
03/01/2019 05:46:48.379	Shift Hand over	Start shift	Louis Longoria	
03/01/2019 05:38:28.425	Shift Hand over	End shift	Zack Webernick	
02/28/2019 18:27:28.273	Shift Hand over	Start shift	Zack Webernick	Relief with Louis L.; running 701 and 702; running 305 on injection; CTGS batching; NGPL start flowing after CTGS batch.
02/28/2019 18:26:59.491	Shift Hand over	End shift	Louis Longoria	
02/28/2019 06:05:22.560	Shift Hand over	Start shift	Louis Longoria	Made relief with Zack W.; Running 701 and 702 regens and withdrawing out of all 3 caverns
02/28/2019 06:02:38.368	Shift Hand over	End shift	Zack Webernick	
02/27/2019 18:46:57.696	Shift Hand over	Start shift	Zack Webernick	Relief with Lee H.; NGPL batching in; all other customers flowing all night; no units running; running 701 and 702; withdrawing out of caverns 1, 2, 3

02/27/2019 18:46:15.305	Shift Hand over	End shift	Lee Hanna	
02/27/2019 06:43:45.735	Shift Hand over	Start shift	Lee Hanna	
02/27/2019 06:12:48.090	Shift Hand over	End shift	Zack Webernich	
02/22/2019 18:17:25.706	Shift Hand over	Start shift	Trae Cruz	
02/22/2019 18:15:19.612	Shift Hand over	End shift	Lee Hanna	
02/22/2019 06:00:00.728	Shift Hand over	Start shift	Lee Hanna	
02/22/2019 05:59:24.338	Shift Hand over	End shift	Trae Cruz	
02/21/2019 18:48:16.085	Shift Hand over	Start shift	Trae Cruz	
02/21/2019 18:05:33.610	Shift Hand over	End shift	Lee Hanna	
02/21/2019 06:16:36.072	Shift Hand over	Start shift	Lee Hanna	
02/21/2019 05:41:51.939	Shift Hand over	End shift	Louis Longoria	
02/20/2019 18:21:58.745	Shift Hand over	Start shift	Louis Longoria	
02/20/2019 17:53:58.241	Shift Hand over	End shift	Zack Webernich	
02/20/2019 05:48:17.452	Shift Hand over	Start shift	Zack Webernich	
02/20/2019 05:46:54.686	Shift Hand over	End shift	Louis Longoria	

02/15/2019 17:39:39.585	Shift Hand over	Start shift	Louis Longoria	
02/15/2019 17:34:53.934	Shift Hand over	End shift	Zack Webernich	
02/15/2019 05:50:16.752	Shift Hand over	Start shift	Zack Webernich	
02/15/2019 05:37:46.250	Shift Hand over	End shift	Louis Longoria	
02/14/2019 17:49:03.944	Shift Hand over	Start shift	Louis Longoria	Made relief with Zack W.; Running units 301 and 303 on a boost and running 702.
02/14/2019 17:47:56.757	Shift Hand over	End shift	Zack Webernich	
02/14/2019 06:32:14.416	Shift Hand over	Start shift	Zack Webernich	Relief with Lee H; no units running; all customers flowed all night; 702 running; no issues from night shift.
02/14/2019 06:31:36.432	Shift Hand over	End shift	Lee Hanna	
02/13/2019 18:06:02.833	Shift Hand over	Start shift	Lee Hanna	Mike from Valero called about shutting in to make up some OBA -I agreed.
02/13/2019 18:05:27.645	Shift Hand over	End shift	Trae Cruz	
02/13/2019 06:12:23.428	Shift Hand over	Start shift	Trae Cruz	Accidentally logged out
02/13/2019 06:04:38.402	Shift Hand over	End shift	Trae Cruz	