

June 19, 2019

Mary L. McDaniel
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Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, Texas 77074

Subject: Response to CPF-4-2019-5009M

Dear Ms. McDaniel,

I am respectfully responding to your letter dated March 8, 2019, in which you requested notification that all violations had been corrected for **CPF-4-2019-5009M**. Talos Energy, LLC is submitting this letter in response to the alleged violations:

Document Number: CPF-4-2019-5009M

Item #1: 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

Throughout the Talos Operation & Maintenance Manual the procedures replicate, paraphrase and reference the regulations. The procedures need to provide specific detail, unique to Talos, discussing how they will safely complete the process in order to satisfy the requirements of §195.402(a).

The following procedures in the Talos Operations & Maintenance Manual need to be amended to include the necessary provisions to comply with the code sections as intended:

1. **Section 1 Introduction**, parrots the code and lacks the specificity necessary to comply with §195.402(c)(13); **Talos Response:** Talos has revised Sec. 1.8 of the O&M Manual to meet the requirements of 195.402(c)(13). See **Exhibit 1** attached for supporting documentation.
2. **Section 3.2 Startup and Section 3.3 Shutdown**, parrots the code and does not discuss starting up and shutting down a pipeline in enough detail to satisfy §195.402(c)(7); **Talos Response:** Talos has revised Sec. 3.2-3.4 of the O&M Manual to meet the requirements of 195.402(c)(7). See **Exhibit 2** attached for supporting documentation.
3. **Section 13 Abnormal Operations**, parrots the code, references the previous operator, and does not discuss the following items in enough detail to satisfy §195.402(d); responding to, investigating and correcting abnormal operating conditions, follow up monitoring, correcting variations from normal operation, accurately listing appropriate personnel to notify, and periodically reviewing the response of operator personnel to determine the effectiveness of responding to abnormal operations; **Talos Response:** Talos has revised Sec. 13 of the O&M Manual to meet the requirements of 195.402(d). See **Exhibit 3** attached for supporting documentation.
4. **Section 14.1 Safety Related Conditions**, parrots the code and lacks the specificity necessary to comply with §195.402(f); **Talos Response:** Talos believes Sec. 14.1 did previously cover what 195.402(f) requires, and that mimicking the code in this scenario is needed to clearly indicate what scenarios would constitute as an SRC. However, Talos has revised Sec. 14 of the O&M Manual to provide more detail on how to report an SRC to fully meet the requirements of 195.402(f). See **Exhibit 4** attached for supporting documentation.

5. **Section 16 Welder Qualifications**, parrots the code and does not discuss the following items in enough detail to satisfy §195.214, §195.222(a), §195.226(a), and §195.234(c); using a qualified welding procedure, qualifying tests, qualifying welders, arc burns and ground wires, and non-destructive testing of welding; **Talos Response:** Talos has revised Sec. 16 of the O&M Manual to meet the requirements of 195.402(d). See **Exhibit 5** attached for supporting documentation.
6. **Section 18 Damage Prevention**, incorrectly labels the Facility Supervisor position and lacks the specificity necessary to comply with §195.402(c)(12); and **Talos Response:** Talos has removed the contents of Section 18 from their O&M because Damage Prevention is not applicable to them per 195.442(d)(1). Talos has revised Sec. 19.7 of the O&M Manual to satisfy the requirements of 195.402(c)(12). See Sec. 19.7 in **Exhibit 6** attached for supporting documentation.
7. **Section 19 Emergency Response Plan**, parrots the code and does not discuss the following items in enough detail to satisfy §195.402(c)(5), §195.402(e), §195.403(a), §195.403(b); receiving, identifying and classifying Notices of Events, response guidelines, emergency shutdown or pressure reduction, controlling spills to minimize possible ignition, minimizing public exposure to injury, characteristics and hazards of hazardous liquids transported, conditions that are likely to cause emergencies, steps necessary to control a release of hazardous liquid, types, sizes and consequences of fire and appropriate response, review of emergency response personnel performance, and training of supervisors on emergency response procedures. **Talos Response:** Talos has revised Sec. 19 of the O&M Manual to satisfy the requirements of 195.402 and 195.403. See **Exhibit 6** attached for supporting documentation.
 - 195.402(c)(5): See Sec. 19.20
 - 195.402(e)(1): See Sec. 19.5 & 19.6
 - 195.402(e)(2): See Sec. 19.9-19.12
 - 195.402(e)(3): See Sec. 19.13
 - 195.402(e)(4): See Sec. 19.3
 - 195.402(e)(5): See Sec. 19.3 & 19.11
 - 195.402(e)(6): See Sec. 19.3
 - 195.402(e)(7): See Sec. 19.7
 - 195.402(e)(8): Sec. 19.3 but N/A no HVL
 - 195.402(e)(9): Sec. 19.22
 - 195.403: Sec. 19.4

Item #2: 195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

Throughout the Talos Operation & Maintenance Manual the procedures replicate, paraphrase and reference the regulations. The procedures need to provide specific detail, unique to Talos, discussing how they will safely complete the process in order to satisfy the requirements of §195.402(c)(3).

1. **Section 4.4 Record Retention**, parrots the code and does not discuss maintaining pump station operating records and the retention of maps and records of cathodic systems in sufficient detail to satisfy §195.404(b) and §195.589(a); **Talos Response:** Talos has revised Sec. 4.4 & 4.8 of the O&M Manual to satisfy the requirements of 195.404(b) and 195.589(a). See **Exhibit 7** attached for supporting documentation.
2. **Section 8.1 Scraper & Sphere Facilities**, parrots the code and fails to discuss safety devices on scraper and sphere facilities in sufficient detail to satisfy §195.426; **Talos Response:** It has been determined that Talos is exempt from 195.426 per 195.120(b)(6). Talos inserted a note into Sec. 8 of the O&M Manual that states they are exempt. See **Exhibit 8** attached for supporting documentation.
3. **Section 9.1 Maximum Operating Pressure**, does not discuss the establishment of Maximum Operating Pressure in sufficient detail to satisfy §195.406(a); **Talos Response:** Talos has revised Sec. 9 of the O&M Manual to satisfy the requirements of 195.406(a). See **Exhibit 9** attached for supporting documentation.

4. **Section 10 Corrosion Control**, parrots the code and does not discuss the following items in enough detail to satisfy §195.561, §195.571, §195.573, §195.575(a), §195.577(a), §195.579, §195.581(a), §195.583(a), §195.585(a) and §195.587; repair of exposed pipe, corrosion deficiencies, electrical isolation of submerged pipelines, testing for and responding to stray currents, investigating and remediating internal corrosion, corrosion inhibitor testing, examining removed pipe, inspecting aboveground pipelines for atmospheric corrosion, repairing and replacing externally corroded pipe, and evaluating remaining strength of internally and externally corroded pipe; **Talos Response:** Talos has revised Sec. 10 of the O&M Manual to satisfy the requirements listed above. See **Exhibit 10** attached for supporting documentation.
- 195.561: Sec. 10.5
 - 195.571: Sec. 10.5.1
 - 195.573: Sec. 10.5.1, 10.5.6, 10.5.10, & 10.6
 - 195.575(a): Sec. 10.5.7
 - 195.577: Sec. 10.5.8
 - 195.579: Sec. 10.4
 - 195.581(a): Sec. 10.7
 - 195.583(a): Sec. 10.7
 - 195.585(a): Sec. 10.9
 - 195.587: Sec. 10.10
5. **Section 11.1 Valve Inspections and Section 11.2 Valve Inspection Procedure**, parrots the code and fails to discuss valve maintenance in sufficient detail to satisfy §195.420(a); and **Talos Response:** Talos has revised Sec. 11.1-11.3 of the O&M Manual to satisfy the requirements of 195.420. See **Exhibit 11** attached for supporting documentation.
6. **Section 17.1 Testing Requirements**, parrots the code and fails to discuss pressure testing in enough detail to satisfy §195.302(b). **Talos Response:** Talos has revised Sec. 17 of the O&M Manual to satisfy the requirements of 195.302(b). See **Exhibit 12** attached for supporting documentation.

Talos is committed to full compliance with the requirements of PHMSA and appreciates your consideration in this matter. Please let me know if you have any questions or require additional information.

Sincerely,
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