

NOTICE OF AMENDMENT

ELECTRONIC MAIL - RETURN RECEIPT REQUESTED

October 6, 2020

Clark White
Executive Vice President, Engineering and Operations
Targa NGL Pipeline Company
811 Louisiana Street, Suite 2100
Houston Texas 77002 - 1400

CPF 4-2020-5011M

Dear Mr. White:

From July 15, 2019 through October 23, 2019, a representative 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 your Targa NGL Pipeline Company's (Targa) procedures for operations and maintenance in Houston, Texas.

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

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.

Targa NGL Pipeline Company's (Targa) written Operation, Maintenance, and Emergency Manual (last revised 2/22/2019) was inadequate as it does not provide detailed written procedures for performing activities on the pipeline facility. The written procedures often parrot, and in some instances, are vague as to how an activity is to be performed. Procedures reviewed and found inadequate include:

1. Cathodic Protection Requirements (reference §195.563) *Targa Hazardous OM&E – Cathodic Protection*, last revised on 06/28/2010;
2. Welding of Supports and Braces (reference §195.208) *Targa Hazardous Liquid OM&E – Construction*, last revised 02/27/2013;
3. Testing of Tie-Ins (reference §195.308) *Targa Hazardous Liquid OM&E – Pressure Testing*, last revised 12/20/2007;
4. Test Medium (reference §195.306) *Targa Hazardous Liquid OM&E – Pressure Testing*, last revised 12/20/2007;
5. Testing of components (reference §195.305) *Targa Hazardous Liquid OM&E – Pressure Testing*, last revised 12/20/2007; and
6. Pressure Testing (reference §195.304) *Targa Hazardous Liquid OM&E – Pressure Testing*, last revised 12/20/2007.

The procedures presented parrot the regulation and do not include a process of how to perform the listed activities.

Targa must revise its written procedures to provide guidance on how the tasks associated with the activities are to be carried out for all the above-mentioned procedures.

2. §195.64 National Registry of Pipeline and LNG Operators.

(c) Changes. Each operator must notify PHMSA electronically through the National Registry of Pipeline and LNG Operators at <http://opsweb.phmsa.dot.gov>, of certain events.

(1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:

(iii) Reversal of product flow direction when the reversal is expected to last more than 30 days. This notification is not required for pipeline systems already designed for bi-directional flow;

Targa's written procedure for providing notifications to the National Registry was inadequate. *Targa Hazardous Liquid Pipeline Normal and Maintenance Procedures – National Registry of Pipeline and LNG Operators*, revised 03/05/2012, does not include a requirement for the notification for the reversal of product flow direction when the reversal is expected to last more than 30 days as required in §195.64(c)(iii).

The procedure was re-revised on 07/16/2019 during the inspection to include the requirement of §195.64(c)(iii) and no further amendments are required.

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 Compliance 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 60 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 (not mandated) that Targa NGL Pipeline Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Mary L. McDaniel, P.E, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2020-5011M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Mary L. McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*