



Targa NGL Pipeline Company
811 Louisiana, Suite 2100
Houston, TX 77002

November 5, 2020

Electronic Mail

Mary McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
8701 S. Gessner Rd, Suite 630
Houston, TX 77074
mary.mcdaniel@dot.gov

**Re: Response to Notice of Amendment CPF 4-2020-5011M
Targa NGL Pipeline Company LLC**

Ms. McDaniel:

Please see the attached documents in response to the above-referenced Notice of Amendment (“NOA”) for the audit conducted between July 15, 2019 through October 23, 2019.

The NOA’s alleged deficiencies and Targa’s response to each are set forth 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 ensure 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;*



Targa NGL Pipeline Company
811 Louisiana, Suite 2100
Houston, TX 77002

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.

Targa Response:

The operations and maintenance procedures that are the subject of the NOA were updated in June 2019 during the latest Operations and Maintenance (O&M) manual review. The O&M Manual identifies the Engineering and Construction (E&C) standards applicable to these operations and maintenance activities. The specific O&M document references an E&C standard discussing the process of how the activity is performed.

1. Cathodic Protection Requirements (reference §195.563)
 - O&M 195.563 Cathodic Protection
 - E&C General Design Standards for Liquid Pipelines and Piping Facilities-B31.4 (Section 9)
 - E&C Land Pipeline Construction (Section 19)
2. Welding of Supports and Braces (reference §195.208)
 - O&M 195.208 Section 4 Construction
 - E&C General Design Standards for Liquid Pipelines and Piping Facilities-B31.4 (Section 14)
3. Testing of Tie-Ins (reference §195.308)
 - O&M 195.308 Testing of Tie Ins
 - Hydrostatic and Pneumatic Testing Standards and Procedures for Steel Piping Systems (Section 15)
 - E&C General Design Standards for Liquid Pipelines and Piping Facilities-B31.4 (Section 25)
4. Test Medium (reference §195.306)
 - O&M 195.306 Test Medium
 - Hydrostatic and Pneumatic Testing Standards and Procedures for Steel Piping Systems (Section 5 & 15)
5. Testing of components (reference §195.305)
 - O&M 195.305 Testing of Components



Targa NGL Pipeline Company
811 Louisiana, Suite 2100
Houston, TX 77002

- Hydrostatic and Pneumatic Testing Standards and Procedures for Steel Piping Systems (Section 5)
 - E&C General Design Standards for Liquid Pipelines and Piping Facilities-B31.4 (Section 25)
6. Pressure Testing (reference §195.304)
- O&M 195.304 Test Pressure
 - Hydrostatic and Pneumatic Testing Standards and Procedures for Steel Piping Systems (Section 15)

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.

Targa Response:

As referenced in the NOA, 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

Targa appreciates the opportunity to work with PHMSA. If you have any questions, please contact me at 713-584-1632.



Targa NGL Pipeline Company
811 Louisiana, Suite 2100
Houston, TX 77002

Regards,

DocuSigned by:

Gregg Johnson

8E054CA53B0E4DF...

Gregg Johnson

Director of Pipeline Compliance

Targa Resources

cc: Bill Grantham, Vice President Operations
Clark White, Executive Vice President Operations
Julie Pabon, Associate General Counsel & Director, Targa Resources