



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

8701 S. Gessner Rd, Suite 630
Houston, Texas 77074

**NOTICE OF PROBABLE VIOLATION
and
PROPOSED COMPLIANCE ORDER**

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 4-2020-5014

Dear Mr. White:

From July 15, 2019 through September 25, 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 Downstream LLC's North Grand Prix system in Houston and Cresson, Texas.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

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 Downstream LLC (Targa) failed to follow its written Operations, Maintenance and Emergency Manual procedure entitled *Maximum Operating Pressure (MOP)* to establish the MOP on its North Grand Prix System. Targa's written procedure for Maximum Operating Pressure (Revised 05/08/2012), page 2, requires the use of its MOP Determination Form (included in the Appendix) to document the establishment of the MOP on its pipeline systems.

PHMSA's review of the records presented during the inspection for the establishment of the MOP on the North Grand Prix pipeline referenced Maximum Allowable Operating Pressure (MAOP) instead of MOP. MAOP is for natural gas pipelines and the form provided included HCA classifications based on Class 1, Class 2, Class 3, and Class 4 Locations which are not applicable under Part 195. The record reflects computations appeared to be carried out for a gas pipeline system and not a liquid pipeline system.

Proposed Compliance Order

With respect to item number 1 pursuant to 49 U.S.C. § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to Targa Downstream LLC. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

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. All material you submit in response to this enforcement action may be 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, or request a hearing under 49 CFR § 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 a Final Order. If you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from receipt of this Notice. This period may be extended by written request for good cause.

In your correspondence on this matter, please refer to **CPF 4-2020-5014** 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

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Compliance Proceedings

PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Targa Downstream LLC (Targa) a Compliance Order incorporating the following remedial requirements to ensure the compliance of Targa with the pipeline safety regulations:

1. In regard to Item Number 1 of the Notice pertaining to establishing the maximum operating pressure on the North Grand Prix pipeline system, Targa shall review the maximum operating pressure determination on the North Grand Prix system to ensure it was established in accordance with Part 195.
3. Targa shall provide complete and corrected records for item 1 of this compliance Order within 30 days of the issuance of the Final Order to PHMSA.
4. It is requested (not mandated) that Targa Downstream LLC maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Mary McDaniel, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs 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.