



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: Final Order & Compliance Order CPF 4-2020-5014

Ms. McDaniel:

Please see the attached documents in response to the above-referenced Compliance Order for the audit conducted between July 15, 2019 through October 23, 2019.

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 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.

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.*
2. *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.*



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

3. *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.*

Targa Response:

Targa reviewed the pressure test documentation for the North Grand Prix (GPN) systems and found it to be in accordance with 49 CFR 195. The MOP of the GPN is 1440 psig. The Lowest recorded test pressure of any segment was 1865 psig and all segments-maintained pressure for a minimum of 8 hours. The Maximum Operating Pressure (MOP) determination documentation has been recorded on the proper forms.

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

Regards,

DocuSigned by:

Handwritten signature of Gregg Johnson in black ink.

8E054CA53B0E4DF...

Gregg Johnson

Director of Pipeline Compliance

Targa Resources Corp

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