

# NOTICE OF AMENDMENT

## ELECTRONIC MAIL - RETURN RECEIPT REQUESTED

February 26, 2021

George Green  
General Vice President of General Counsel  
DCP Midstream  
370 17<sup>th</sup> Street, Suite 2500  
Denver, Colorado 80202

CPF 4-2021-026 NOA

Dear Mr. Green:

From May 11, 2020 through August 31, 2020, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected DCP Midstream's (DCP) procedures for operation and maintenance in Houston, Texas, via video teleconference.

Based on the inspection, PHMSA has identified apparent inadequacies found within DCP'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.**

**§ 195.444 Leak detection.**

**(a)...**

**(c) CPM leak detection systems. Each computational pipeline monitoring (CPM) leak detection system installed on a hazardous liquid pipeline must comply with API RP 1130 (incorporated by reference, see § 195.3) in operating, maintaining, testing, record keeping, and dispatcher training of the system.**

DCP's *Leak Detection Program* procedures, dated November 6, 2019, were inadequate in two areas. First, DCP's procedures did not include a process for initial testing of the Leak Detection System (LDS) to establish a baseline of performance, as required by incorporated by reference API RP 1130, Section 6.2.2 and second, DCP did not include a process for instrumentation maintenance and calibration, as required by incorporated by reference API RP 1130, Section 5.1.3.

DCP provided revised *Leak Detection Program* procedures dated October 28, 2020, which now include a process for initial testing of the LDS that establishes a baseline of performance and a process for instrumentation maintenance and calibration. These procedures were reviewed and found to be adequate.

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 30 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.

As noted above, the inadequacies identified herein have been addressed in the operator's amended procedures, therefore any enforcement action is closed.

It is requested (not mandated) that DCP Midstream 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, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2021-026 NOA**, and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

cc: John Pontious, Manager of Pipeline Compliance, DCP Midstream, [jdpointious@dcpmidstream.com](mailto:jdpointious@dcpmidstream.com)  
Mark Glenn, Sr. Pipeline & Integrity Specialist, DCP Midstream, [mglenn@dcpmidstream.com](mailto:mglenn@dcpmidstream.com)