



September 17, 2021

Ms. Mary McDaniel
Director, Southwest Region, PHMSA
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, Texas 77074

RE: CPF 4-2021-027-NOPV
(39520) Delfin Offshore Pipeline LLC (Delfin)
Inspection: October 27, 2020 through March 3, 2021
Response to NOPV Letter, dated August 18, 2021

Dear Ms. McDaniel:

From October 27, 2020 through March 3, 2021, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) conducted a virtual inspection of the Delfin Offshore Pipeline LLC's (Delfin) (OPID # 39520) operations and maintenance plan and written records. Based on the inspection, the alleged findings during the virtual inspection were found to be probable violations of the Pipeline Safety regulations, Title 49, Code of Federal regulations (CFR).

On behalf of Delfin Offshore Pipeline LLC (39520), Manta Ray Gathering Company, a wholly owned subsidiary of Genesis Energy, L.P. (Genesis), Genesis is electing to respond to the four alleged NOPV's. The items referenced in the PHMSA correspondence letter are the following:

Item #1, 192.605(a), Procedural manual for operations, maintenance, and emergencies.

The Interoffice Memorandum between Delfin and Genesis covering the maintenance and operation of the offshore assets didn't reference the Delfin operatorship (39520).

Item #1, Documentation

In collaboration with Delfin Offshore Pipeline LLC, the pipeline segment (UTOS, 42") is now managed and maintained under the *Genesis Energy Gas Operations, Maintenance, and Emergency Procedures Manual* (GOME). Pages from the GOME operators of record and identification numbers (covered under the plan) are attached in the plan of correction Enclosures. A copy of the GOME available upon request.

Item #2, 192.615(a), Emergency Plans.

The Interoffice Memorandum between Delfin and Genesis covering environmental response planning didn't reference the Delfin operatorship (39520).

Item #2, Documentation

The previous product in the pipeline was natural gas which doesn't require Genesis place this pipeline segment in the 49 CFR 194 Louisiana Oil Spill Response Planning. Only hazardous liquids are required by rule. Genesis has determined the pipeline segment to be managed under the emergency procedures under the GOME and doesn't require the asset to be in the oil spill response planning. A copy of the *Genesis Emergency Procedure, Section 700* is attached in the enclosures section of this plan of correction.

Item #3, 192.805, Operator Qualification.

The Interoffice Memorandum between Delfin and Genesis covering Operator Qualification program didn't reference the Delfin operatorship (39520).

Item #3, Documentation

The pipeline segment is now managed and maintained under the *Genesis Energy Operator Qualification Plan*. Pages from the Operator Qualification Plan and identification numbers (covered under the plan) is attached in the enclosures section of this plan of correction. A copy of the Operator Qualification Plan is available upon request.

Item #4, 192.907, What must an operator do to implement this subpart?

The Interoffice Memorandum between Delfin and Genesis covering the Genesis Integrity Management Program Operator Qualification program didn't reference the Delfin operatorship (39520), contain the pipe segment in the system listing, or have risk ranked within the Genesis IMP program.

Item #4, Documentation

The pipeline segment is now managed and maintained under the *Genesis Energy Pipeline Integrity Plan*. Pages from the pipeline integrity program Operator Qualification Plan and identification numbers (covered under the plan) is attached in the enclosures section of this plan of correction. The referenced UTOS pipeline segment is undergoing an informational analysis and risk ranking within the Genesis GIS database. A copy of the Genesis Pipeline Integrity Plan is available upon request.

On behalf of Delfin, the Genesis program changes referenced herein shall undergo a management of change (MOC) as required by Genesis policies and procedures. Genesis anticipates MOC completion soon. We appreciate the opportunity to work with the Pipeline and Hazardous Materials Safety Administration regarding the safe operation of our pipelines.

Attachments:

1. Genesis Gas OM Manual (Introduction)
2. Genesis Gas OM Manual (Sec. 700)
3. Genesis Operator Qualification Plan
4. Genesis Pipeline Integrity Plan

If you have any questions or comments, please feel free to contact me directly at 850-933-1720 or by e-mail at w.daughdrill@delfinlng.com.

Sincerely,

Dr. John R. Jewett

p.p. Dr. John R. Jewett, P.G., E.G.
Sr. Mgr. of Regulatory & Compliance
Genesis Energy, L.P.

CC: Dudley Poston, CEO
Bill Daughdrill, President
Tim Trahan
Wouter Pastoor