



May 2, 2022

Ms. Mary McDaniel  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 S. Gessner Road, Suite 900  
Houston, Texas 77074

RE: CPF 4-2022-029-NOA  
(39352) Genesis Offshore Holdings, LLC (Genesis)  
Inspection covering CHOPS and Poseidon Pipelines  
Response to alleged NOAs

Dear Ms. McDaniel:

From March 3, 2021, through October 28, 2021, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) inspected the Genesis Offshore Holdings, LLC pipeline systems, including the written operations and maintenance (O&M) procedures, records, and associated programs.

The PHMSA inspector identified some inadequacies within the Genesis procedures based on the inspection.

**Item 1, 49 CFR 195.308, Testing of tie-ins.**

The PHMSA inspector alleges the procedure Engineering Standards and Specifications, STD 4507, Pipeline Hydrostatic Testing, dated 8/2020, is inadequate. The alleged inadequacy is due to the procedure not addressing tie-ins, either with the section of the pipe to be connected (tie-in) or separately by 49 CFR 195.308.

Item 1 - Response

Genesis Pipeline Integrity representatives added a new sentence in Engineering Standards and Specifications, STD 4507, Pipeline Hydrostatic Testing, Section 3.0, paragraph (3)(a).

The new sentence reads: "Tie-ins shall be tested according to ASME B31.4."

Please refer to the supporting documents attached regarding the referenced changes.

**Item 2, 49 CFR 195.452 (a)...(g)**

The PHMSA inspector alleges the Genesis Integrity Management Program, IM Procedure 601L, Liquid Information Analysis Procedure, 1.1.2 (Revision date 8/14/2020) is inadequate. The alleged inadequacy allows for the informational analysis to be performed, including on the day of the scheduled assessment. The current IM Procedure states, "The informational analysis shall be performed within a two (2) year informational analysis period measured prior to the date of the scheduled assessment."

The PHMSA inspector recommended that Genesis revise the procedure to include an interval for performing an analysis to be completed and allow for an additional time frame for potential changes to the assessment planning as additional data is gathered.

Item 2 - Response

Please refer to the Genesis Pipeline Integrity Manual. The manual contains updated wording in paragraph 1.1.2 under 601L.

The paragraph reads, "The information analysis shall be performed prior to the next scheduled reassessment."

Please refer to the supporting documents attached regarding the referenced changes.

**Item 3, 49 CFR 195.452 (a)...(h)**

The PHMSA inspector alleges that the Genesis Integrity Management Program, IM Procedure 402, ILI Report Analysis Procedure for HCAs (Revision date 8/14/2020) is inadequate. The alleged inadequacy is due to the procedure not addressing a 49 CFR 195.452 (h)(2) requirement. In addition, in Section 2.2.14, the procedure is inadequate for not addressing failures to provide provisions to notify PHMSA when the operator believes 180 days are impractical, to determine a condition found during an assessment, and provide an expected date when the information analysis will be available.

The Genesis procedure states, "Discovery of the conditions listed in an ILI Assessment Report occurs on the date that the ILI coordinator has determined the report to be valid. Discovery occurs no later than 180 days after the completion of an assessment unless it can be demonstrated that the 180-day period is impractical. If no discovery is to occur later than 180-days after the completion of an assessment, the deviation shall be documented."

Item 3 - Response

Please refer to the Genesis Pipeline Integrity Manual. The manual contains a new sentence under 402, paragraph 2.2.1.4.

The sentence reads, "If the 180-day period is deemed impractical, the notification must be made to the regulatory agency in accordance with 195.452(m) and provide a date of when adequate information will become available."

Please refer to the supporting documents attached regarding the referenced changes.

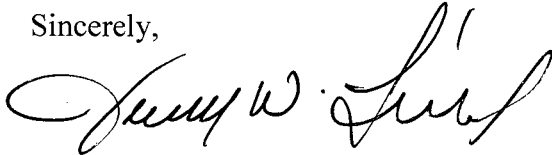
**Genesis Referenced Materials & Attachments**

1. Genesis Engineering Standards and Specifications, STD 4507, Pipeline Hydrostatic Testing
2. Genesis Integrity Management Program Manual

Genesis procedures referenced herein are included with the plan of correction. Additional information can be made available to PHMSA upon request. We appreciate the opportunity to work with the Pipeline and Hazardous Materials Safety Administration regarding the safe operation of our pipelines.

If you have any questions or comments, please contact me directly at 713-860-2542 or by e-mail at [Jeff.Gifford@genlp.com](mailto:Jeff.Gifford@genlp.com).

Sincerely,



Jeffrey W. Gifford  
Vice President, HSSE