



April 3, 2023

Mr. Bryan Lethcoe
Director, Southwest Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074

Re: ONEOK NGL Pipeline, L.L.C.
Notice of Amendment CPF 4-2023-037-NOA

Dear Mr. Lethcoe,

From March 4 to September 23, 2022, a representative of your office with the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected ONEOK's NGL Pipeline, LLC's integrity management plan in Spearfish, South Dakota. As a result of the inspection, PHMSA identified an apparent inadequacy found within ONEOK's procedures, as described below:

ONEOK's written integrity management plan was inadequate to assure safe operation of a pipeline facility in accordance with § 195.402(c)(3). Specifically, ONEOK's integrity management plan, ONEOK HLIMP (Rev 1.1 – Effective: 11/1/21), failed to include procedures to periodically evaluate the integrity of each pipeline segment that could affect a high consequence area in accordance with § 195.452(j)(1).

Section 10 of ONEOK's integrity management plan requires a periodic evaluation of pipeline segments, but the plan failed to provide details on this periodic evaluation, and it failed to state how often the periodic evaluation must occur. The plan must contain a step-by-step process that personnel can follow to conduct the periodic evaluation.

Therefore, ONEOK's written integrity management plan was inadequate to assure safe operation of a pipeline facility in accordance with § 195.402(c)(3). ONEOK must revise its integrity management plan to include detailed procedures to conduct a periodic evaluation in accordance with § 195.452(j)(1).

ONEOK NGL Pipeline L.L.C. acknowledges receipt of Notice of Amendment CPF 4-2032-037-NOA dated March 10th, 2023. In response to this notice, ONEOK NGL Pipeline L.L.C. proposes adding clarifying language to Section 10 of the Hazardous Liquids Integrity Management Plan that includes references to the procedures used as part of the process of periodic evaluations of pipeline segments in accordance with 49 CFR 195.452(j)(1). Enclosed with this letter is the proposed clarifying language for Section 10.



ONEOK is confident adding these procedure references to the Hazardous Liquids Integrity Management Plan will provide clarity on how the continual evaluation and assessments will be conducted.

If you require additional information or clarification to any of these actions, please contact Ryan McCoy, Manager, Regulatory Compliance, at 918-382-2022 or ryan.mccoy@oneok.com

Sincerely,

DocuSigned by:
Walter Allen
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Walter Allen
Vice President, Natural Gas Liquids Operations – ONEOK