



04-13-17A11:43 RCVD

April 10, 2017

ATTN: Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration – Pipeline Safety
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

RE: CPF 5-2017-6003

This letter serves as Summit Midstream Partners, LLC's response to the *Proposed Compliance Order* for the referenced pipeline safety inspection of the Hereford HVL pipeline in Grover, Colorado. All items in the *Proposed Compliance Order* have been completed. Please find an item-by-item explanation attached for your review.

Please contact me at **832-608-6145**, if you have any questions or need any additional information related to the corrective action taken.

Thank you,

Alfred Garcia Jr.
Pipeline Compliance Manager
Summit Midstream Partners, LLC
agarcia@summitmidstream.com

Enclosures: Summit Corrective Action

Houston
1790 Hughes Landing Blvd, Suite 500
The Woodlands, TX 77380
Phone: 832.413.4770

Denver
999 18th Street, Suite 3400 S
Denver, CO 80202
Phone: 720-452-6220
Fax: 720-452-6227

Atlanta
2300 Windy Ridge Parkway, Suite 840N
Atlanta, GA 30339
Phone: 770-504-5000
Fax: 770-504-5005

Summit Midstream Partners LLC – Corrective Action to CPF 5-2017-6003

In regard to Item Number 3 and Item Number 4 of the Notice pertaining to maps and records, Summit Midstream Partners has modified its recordkeeping system so it can comply with the three-year recordkeeping requirement for daily operating records of discharge pressure, emergency operations and abnormal operations. The corrective actions taken are listed:

- Prior to the inspection by PHMSA Western Region the three-year record retention gap was discovered during an internal assessment of the existing SCADA system. The retention period for the SCADA tag associated with the pump discharge pressure was not set properly. The SCADA tag was reset to retain data a minimum of three years on August 21, 2015.
- A new SCADA system, with more robust storage and reporting features over the existing SCADA system, was implemented by Summit Midstream Partners on February 16, 2017.
- The new SCADA system will store all daily data for a minimum of three years. Daily data will include the spot data, the 24 hour average data, as well as the min and max for the 24 hour period.
- Emergency and Abnormal Operations can be extracted from the database utilizing Point Monitor, which is a trending tool in the new SCADA system.
- Emergency and Abnormal Operations are also captured in the controller log application as required by Summit Midstream Partners Control Room Management Plan. The electronic controller logs are kept for a period of three years.
- All data is stored in both the primary and backup databases.

Summit Midstream Partners believes these corrective actions satisfy the requirements of the *Proposed Compliance Order* and requests that PHMSA confirm that assertion.