



Collins Pipeline Company
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973-455-7500

February 26, 2026

Robert Burrough
Director, Eastern Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: Notice of Probable Violation – CPF 1-2026-006-NOPV

Dear Mr. Burrough,

Collins Pipeline Company (CPC) received the referenced Notice of Probable Violation (NOPV) issued by the Pipeline Hazardous Materials and Safety Administration (PHMSA) on January 27, 2026. PHMSA performed an investigation underlying the NOPV from December 29 through 31, 2021 and January 4 through February 1, 2022 related to a CPC pipeline incident that occurred on December 27, 2021. CPC is committed to pipeline safety and appreciates PHMSA's coordination in response to the incident.

As provided below, CPC, without admission and in the spirit of cooperation, is not contesting the NOPV and will separately submit payment of the proposed total civil penalty of \$195,700. CPC provides this response to clarify the facts underlying the NOPV allegations for the record and share the corrective actions it undertook in response to the incident.

NOPV Item No. 1 - 49 C.F.R. § 195.402(a):

Without admission, CPC does not contest the proposed civil penalty of \$46,600 for NOPV Item No. 1. However, as to the allegations regarding NOPV Item No. 1, without admission, CPC clarifies that the on-duty Controller initially believed that SCADA alarms were attributable to a number of circumstances, including abnormal behavior of a control valve, slack line conditions, uncommanded pump shutdowns, and field troubleshooting activities.

In response to the incident, CPC comprehensively reviewed its training program for Controllers and implemented additional training for all Controllers including additional leak detection training, pipeline hydraulics training and leak detection system response tabletop drills.

NOPV Item No. 2 - 49 C.F.R. § 195.444(b):

Without admission, CPC does not contest the proposed civil penalty of \$55,900 for NOPV Item No. 2. However, as to the allegations regarding NOPV Item No. 2, without admission, CPC clarifies that one of three Leak Detection System (LDS) modules did detect a release.

In response to the incident, CPC reevaluated the three LDS modules, updated their threshold settings, and tested each module. CPC continues to evaluate the LDS modules' operating parameters and performance on an ongoing basis.

NOPV Item No. 3 - 49 C.F.R. § 195.452(b)(5):

Without admission, CPC does not contest the proposed civil penalty of \$46,600 for NOPV Item No. 3. However, as to the allegations regarding NOPV Item No. 3, without admission, CPC clarifies that it does consider tool tolerance as part of integrity evaluations performed in accordance with its Integrity Management Program (IMP). Based on common industry practices, historical experience, and industry accepted defect assessment practices, CPC utilized RSTRENG PSafe methodology for predicting failure pressure. While the preliminary ILI results identified a corrosion feature at MP 3.79 that triggered Safety Related Condition (SRC) reporting, pressure reduction, and repair planning, CPC concurrently initiated extensive validation efforts at comparable nearby locations to better understand ILI performance. These excavations employed high-resolution laser scanning and generated substantial in-ditch measurement data, indicating the ILI's reported depth for similar anomalies was deeper than found in the field, which influenced CPC's engineering evaluation and pressure management approach.

In response to the incident, CPC implemented enhancements to the ILI selection and data integration process within its Integrity Management Program to further manage complex corrosion and further enhance its in-house subject matter expertise.

NOPV Item No. 4 - 49 C.F.R. § 195.452(h)(1):

Without admission, CPC does not contest the proposed civil penalty of \$46,600 for NOPV Item No. 4. However, as to the allegations regarding NOPV Item No. 4, without admission, CPC clarifies that upon identification of the anomaly at MP 3.79, CPC promptly initiated Immediate Repair procedures, submitted the required Safety Related Condition (SRC) report, and implemented an immediate operating pressure reduction consistent with regulatory requirements. As discussed in CPC's response to NOPV Item No. 3 above, CPC initiated further validation efforts using extensive in-ditch data to characterize the anomaly. This refinement did not delay or alter CPC's pursuit of excavation and repair, which continued to progress as site access and permitting allowed.

In response to the incident, and in addition to the IMP and subject matter expertise enhancements discussed above, CPC implemented an enhanced risk management element as part of its pipeline safety management systems program, which included improved meaningful metrics, a more formalized risk approval process, and an ongoing Plan-Do-Check-Act process consistent with API RP-1173.

In closing, CPC again thanks PHMSA for its coordination in response to the incident. Upon confirmation of receipt of the separate wire transfer for payment of the total civil penalty of \$195,700, CPC requests that PHMSA consider case number CPF 1-2026-006-NOPV closed.

If you have any questions, or need additional information, please feel free to contact me at 281-602-4224.

Respectfully,

A handwritten signature in blue ink, appearing to read "Thomas J. McLane". The signature is stylized with a large, flowing "M" and "L".

Thomas J. McLane
Director, PBF Logistics Regulatory Compliance

CC:
Matthew Lucey (Collins Pipeline Company)

