



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

901 Locust Street, Suite 462
Kansas City, MO 64106-2641

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 4, 2017

Mr. Rene Casadaban, Chief Operating Officer
Summit Midstream Partners, LLC
1800 One Hughes Landing Blvd., Suite 300
The Woodlands, TX 77380

CPF 3-2017-5001M

Dear Mr. Casadaban:

On April 5-7, 2016, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Summit Midstream Partner, LLC's (Summit's) procedures for damage prevention, public awareness and operations and maintenance in Epping, North Dakota.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within Summit's plans or procedures, as described below:

1. §195.402 Procedural manual for operations, maintenance, and emergencies

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(12) Establishing and maintaining liaison with fire, police, and other appropriate public officials to learn the responsibility and resources of each government organization that may respond to a hazardous liquid or pipeline emergency and acquaint the officials with the operator's ability in responding to a hazardous liquid or carbon dioxide pipeline emergency and means of communication.

§195.440 Public awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Summit's procedures were inadequate because its Damage Prevention/Public Awareness plan dated 12-31-2013 was missing the following:

- Learn the responsibility and resources of each government organization that may respond to a hazardous liquids pipeline emergency.
- Identify the types of pipeline emergencies of which the operator notifies the officials.
- Acquaint the officials with the operator's ability in responding to a hazardous liquids pipeline emergency and means of communication.
- Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.
- Identify if any combined operator/public agency training sessions/exercises are needed.

Summit must address the items above in its procedures.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

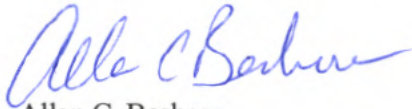
Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose

that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Summit Midstream Partners, LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to [Region Director's name], Director, [Region], Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2017-5001M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Since the inspection, Summit Midstream Partners, LLC has submitted revised procedures to resolve these issues. PHMSA Central Region personnel have reviewed the revised procedures and determined that the revisions satisfy the deficiencies identified in the above item. Therefore, no further action is required and this enforcement action is considered closed.

Sincerely,



Allan C. Beshore
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*