# NOTICE OF AMENDMENT

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

December 7, 2018

Mr. Jason Swaren
Vice President, Operations
Oasis Midstream Partners
1001 Fannin St. Suite 1500
Houston, TX 77002

**CPF 3-2018-5011M**

Dear Mr. Swaren:

From January 8 - 12, January 29 – February 2, February 12 – 16 and April 16 – 20, 2018, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Oasis Petroleum North America's (Oasis) procedures for Operation & Maintenance, Public Awareness, Operator Qualification, Integrity Management, Control Room Management, Construction and Emergency Response in Houston, TX.

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

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

**(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline**

**system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

**(b) . . . .**

**(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:**

**(1) . . . .**

**(2) Gathering of data needed for reporting accidents under subpart B of this part in a timely and effective manner.**

**§195.54 Accident reports.**

**(b) Whenever an operator receives any changes in the information reported or additions to the original report on DOT Form 7000-1, it shall file a supplemental report within 30 days.**

Oasis' Operation and Maintenance manual (O&M) was inadequate because it did not have a procedure to file a supplemental report within 30 days after receiving any changes in information reported or additions to the original report on DOT Form 7000-1. Specifically, procedure P-195.50 did not cover supplemental reporting requirements. Oasis submitted updated procedure P-195.50 on 5/18/2018 that satisfactorily addressed this item. No further action is required.

2. **§195.402(a) – See Above**

**§195.64 National Registry of Pipeline and LNG Operators.**

**(a) OPID Request. Effective January 1, 2012, each operator of a hazardous liquid or carbon dioxide pipeline or pipeline facility must obtain from PHMSA an Operator Identification Number (OPID). An OPID is assigned to an operator for the pipeline or pipeline system for which the operator has primary responsibility. To obtain an OPID or a change to an OPID, an operator must complete an OPID Assignment Request DOT Form PHMSA F 1000.1 through the National Registry of Pipeline and LNG Operators in accordance with §195.58.**

Oasis' O&M manual was inadequate because it did not have a procedure to require the obtaining, and appropriate control of Operator Identification Numbers (OPIDs). Oasis developed and submitted procedure P-195.64 on 3/29/2018 that satisfactorily addressed this item. No further action is required.

3. **§195.402(a) – See Above**

**§195.64 National Registry of Pipeline and LNG Operators.**

**(c) Changes. Each operator must notify PHMSA electronically through the National Registry of Pipeline and LNG Operators at http://opsweb.phmsa.dot.gov, of certain events.**

**(1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:**

**(i) Construction or any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs $10 million or more. If 60 day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable;**

**(ii) Construction of 10 or more miles of a new or replacement hazardous liquid or carbon dioxide pipeline;**

**(iii) Reversal of product flow direction when the reversal is expected to last more than 30 days. This notification is not required for pipeline systems already designed for bi-directional flow; or**

**(iv) A pipeline converted for service under § 195.5, or a change in commodity as reported on the annual report as required by § 195.49.**

Oasis' O&M manual was inadequate because it did not have a procedure to require notification for facility construction of $10 million or more, 10 or more miles of pipeline, reversal of product flow or pipeline converted for service. Oasis developed and submitted procedure P-195.64 on 3/29/2018 that satisfactorily addressed this item. No further action is required.

4. **§195.402(a) – See Above**

   **§195.64(c) – See Above**

   **(2) An operator must notify PHMSA of any following event not later than 60 days after the event occurs:**

   **(i) A change in the primary entity responsible (i.e., with an assigned OPID) for managing or administering a safety program required by this part covering pipeline facilities operated under multiple OPIDs.**

   **(ii) A change in the name of the operator;**

   **(iii) A change in the entity (e.g., company, municipality) responsible for operating an existing pipeline, pipeline segment, or pipeline facility;**

   **(iv) The acquisition or divestiture of 50 or more miles of pipeline or pipeline**

**system subject to this part; or**

**(v) The acquisition or divestiture of an existing pipeline facility subject to this part.**

Oasis's O&M manual was inadequate because it did not have a procedure to require notification for a change in primary entity responsible for administering a safety program, change in name of operator, change in entity responsible for operations, the acquisition/divestiture of 50 or more miles of pipeline or the acquisition/divestiture of an existing facility. Oasis developed and submitted procedure P-195.64 on 3/29/2018 that satisfactorily addressed this item. No further action is required.

5. **§195.402(a) – See Above**

**§195.64 National Registry of Pipeline and LNG Operators.**

**(d) Reporting. An operator must use the OPID issued by PHMSA for all reporting requirements covered under this subchapter and for submissions to the National Pipeline Mapping System.**

Oasis' O&M manual was inadequate because it did not have a procedure to ensure that the OPID issued by PHMSA must be used on all reporting requirements and submissions to NPMS. Oasis developed and submitted procedure P-195.64 on 3/29/2018 that satisfactorily addressed this item. No further action is required.

6. **§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:**

**(1) Making construction records, maps, and operating history available as necessary for safe operation and maintenance.**

**(2) Gathering of data needed for reporting accidents under subpart B of this part in a timely and effective manner.**

**(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

**§195.410 Line markers.**

**(a) Except as provided in paragraph (b) of this section, each operator shall place and maintain line markers over each buried pipeline in accordance with the following:**

**(2) The marker must state at least the following on a background of sharply contrasting color:**

**(i) The word "Warning," "Caution," or "Danger" followed by the words "Petroleum (or the name of the hazardous liquid transported) Pipeline", or "Carbon Dioxide Pipeline," all of which, except for markers in heavily developed urban areas, must be in letters at least 1 inch (25 millimeters) high with an approximate stroke of 1/4 inch (6.4 millimeters).**

**(ii) The name of the operator and a telephone number (including area code) where the operator can be reached at all times.**

Oasis' O&M manual was inadequate because it did not have a defined procedure to address the content and format required on the line markers. Oasis submitted updated procedure P-195.410 on 4/13/2018 which satisfactorily addressed this item. No further action is required.

7. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
**(a) . . . .**
**(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:**

**(1) Making construction records, maps, and operating history available as necessary for safe operation and maintenance.**

Oasis' O&M manual was inadequate because it did not have a defined procedure to address making construction records, maps, and operating history available as necessary for safe operation and maintenance. Specifically, Procedure P-195.402(c)(1) did not state how the maps and construction records are obtained by personnel. Oasis submitted updated procedure P-195.402(c)(1) on 3/29/2018 which satisfactorily addressed this item. No further action is required.

8. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

**(a) . . . .**

**(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:**

**(3) Operating, maintaining, and repairing the pipeline system in accordance with**

**each of the requirements of this subpart and subpart H of this part.**

**§195.428 Overpressure safety devices and overfill protection systems.**

**(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.**

Oasis' O&M manual was inadequate because it did not have a defined procedure to adequately detail the inspecting and testing of each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment. Specifically, procedure P-195.428(a) did not address inspection of thermal relief valves. Oasis submitted updated procedures on 4/13/2018 that satisfactorily addressed this item. No further action is required.

9. **§195.402(c)(3) – See Above**

**§195.555 What are the qualifications for supervisors?**

**You must require and verify that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures established under §195.402(c)(3) for which they are responsible for insuring compliance.**

Oasis' O&M manual was inadequate because it did not have a defined procedure to require supervisors to maintain a thorough knowledge of corrosion control procedures they are responsible for, and verify that knowledge. Oasis submitted updated procedures on 5/18/2018 that satisfactorily addressed this item. No further action is required.

10. **§195.402(c)(3) – See Above**

**§195.569 Do I have to examine exposed portions of buried pipelines?**

**Whenever you have knowledge that any portion of a buried pipeline is exposed, you must examine the exposed portion for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated. If you find external corrosion requiring corrective action under §195.585, you must investigate circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion.**

Oasis' O&M manual was inadequate because it did not have a defined procedure to require that exposed portions of buried pipeline be examined for external corrosion and coating deterioration, and if external corrosion is found, further examination required to determine the extent of the corrosion. Specifically, procedure P-195.569 did not have sufficient details for the examination of exposed pipeline and did not address steps to take if corrosion is found. Oasis submitted updated procedures on 3/19/2018 that satisfactorily addressed this item. No further action is required.

**11. §195.402(c)(3) – See Above**

**§195.571 What criteria must I use to determine the adequacy of cathodic protection?**

**Cathodic protection required by this subpart must comply with one or more of the applicable criteria and other considerations for cathodic protection contained paragraphs 6.2.2, 6.2.3, 6.2.4, 6.2.5 and 6.3 in NACE SP 0169 (incorporated by reference, see §195.3).**

Oasis' O&M manual was inadequate because it did not have defined procedures requiring that CP monitoring criteria be used that is acceptable per NACE SP 0169. Oasis developed procedure P-195.571 which addresses IR drop and updated procedure 195.573(a) with acceptable CP monitoring criteria which satisfactorily addressed this item. No further action is required.

**12. §195.402(c)(3) – See Above**

**§195.573 What must I do to monitor external corrosion control?**

**(a) Protected pipelines. You must do the following to determine whether cathodic protection required by this subpart complies with §195.571:**

**(2) Identify not more than 2 years after cathodic protection is installed, the circumstances in which a close-interval survey or comparable technology is practicable and necessary to accomplish the objectives of paragraph 10.1.1.3 of NACE SP 0169 (incorporated by reference, see §195.3).**

Oasis' O&M manual was inadequate because it did not have a defined procedure to describe the circumstances in which a CIS or comparable technology is practicable and necessary no more than 2 years after a cathodic protection system has been installed. Oasis submitted updated procedure P-195.573(a)(2) on 9/13/2018 that satisfactorily addressed this item. No further action is required.

**13. §195.402(c)(3) – See Above**

**§195.573 What must I do to monitor external corrosion control?**

**(e) Corrective action. You must correct any identified deficiency in corrosion control as required by §195.401(b). However, if the deficiency involves a pipeline in an integrity management program under §195.452, you must correct the deficiency as required by §195.452(h).**

Oasis's O&M manual was inadequate because it did not have a defined procedure to require correction of any identified deficiencies in corrosion control. Oasis submitted updated procedure P195.573(a) on 3/29/2018 which satisfactorily addressed this item. No further action is required.

**14. §195.402(c)(3) – See Above**

**§195.575 Which facilities must I electrically isolate and what inspections, tests, and safeguards are required?**

**(a) You must electrically isolate each buried or submerged pipeline from other metallic structures, unless you electrically interconnect and cathodically protect the pipeline and the other structures as a single unit.**

**(b) You must install one or more insulating devices where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control.**

**(c) You must inspect and electrically test each electrical isolation to assure the isolation is adequate.**

**(d) If you install an insulating device in an area where a combustible atmosphere is reasonable to foresee, you must take precautions to prevent arcing.**

**(e) If a pipeline is in close proximity to electrical transmission tower footings, ground cables, or counterpoise, or in other areas where it is reasonable to foresee fault currents or an unusual risk of lightning, you must protect the pipeline against damage from fault currents or lightning and take protective measures at insulating devices.**

Oasis' O&M manual was inadequate because it did not have a defined procedure to give guidance for electrically isolating each buried or submerged pipeline from other metallic structures or what inspections, tests, and safeguards are required. Oasis developed and submitted procedure P195.575 on 4/6/2018 which satisfactorily addressed this item. No further action is required.

**15. §195.402(c)(3) – See Above**

**§195.579 What must I do to mitigate internal corrosion?**

**(c) Removing pipe. Whenever you remove pipe from a pipeline, you must inspect the internal surface of the pipe for evidence of corrosion. If you find internal corrosion requiring corrective action under §195.585, you must investigate circumferentially and longitudinally beyond the removed pipe (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the removed pipe.**

Oasis' O&M manual was inadequate because it did not have a defined procedure to require personnel to examine removed pipe for evidence of internal corrosion. Oasis submitted updated procedure P195.579(c) on 3/29/2018 which satisfactorily addressed this item. No further action is required.

**16. §195.402(c)(3) – See Above**

**§195.581 Which pipelines must I protect against atmospheric corrosion and what coating material may I use?**

**(b) Coating material must be suitable for the prevention of atmospheric corrosion.**

Oasis' O&M manual was inadequate because it did not have a defined procedure for the protection of pipelines against atmospheric corrosion. Specifically, procedure P-195.581 did not address requirements for coating material to be suitable for the prevention of atmospheric corrosion. Oasis submitted updated procedure P195.581 on 3/29/2018 which satisfactorily addressed this item. No further action is required.

**17. §195.402 Procedural manual for operations, maintenance, and emergencies.**

**(d) Abnormal operation. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:**

**(3) Correcting variations from normal operation of pressure and flow equipment and controls.**

Oasis' O&M manual was inadequate because it did not have a defined procedure for correcting variations from normal operation of pressure and flow equipment and controls. Specifically, procedure 195.402(d) did not address the steps that should be taken or who would perform the investigation. Oasis submitted updated procedures on 4/6/2018 that satisfactorily addressed this item. No further action is required.

**18. §195.402 Procedural manual for operations, maintenance, and emergencies.**

**(e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs:**

**(1) Receiving, identifying, and classifying notices of events which need immediate response by the operator or notice to fire, police, or other appropriate public officials and communicating this information to appropriate operator personnel for corrective action.**

Oasis' O&M manual was inadequate because it did not have a defined procedure for receiving, identifying, and classifying notices of events which need immediate response by the operator or notice to fire, police, or other appropriate public officials and communicating this information to appropriate operator personnel for corrective action during an emergency condition. Specifically, the procedures did not include external notifications and classification of external and internal notifications of incidents. Oasis submitted updated procedures on 5/7/2018 that satisfactorily addressed this item. No further action is required.

**19. §195.403 Emergency Response Training.**

**(a) Each operator shall establish and conduct a continuing training program to instruct emergency response personnel to:**

**(5) Learn the potential causes, types, sizes, and consequences of fire and the appropriate use of portable fire extinguishers and other on-site fire control equipment, involving, where feasible, a simulated pipeline emergency condition.**

Oasis' O&M manual was inadequate because it did not have a defined procedure to conduct a continuing training program to instruct emergency response personnel. Specifically, the training did not include provisions to learn the potential causes, types, sizes, and consequences of fire and the appropriate use of portable fire extinguishers and other on-site fire control equipment, involving, where feasible, a simulated pipeline emergency condition and how to receive, identify and classify notices of events which need immediate response. Oasis submitted updated procedures on 5/7/2018 that satisfactorily addressed this item. No further action is required.

**20. §195.442 Damage prevention program.**

**(a) Except as provided in paragraph (d) of this section, each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities. For the purpose of this section, the term "excavation activities" includes excavation, blasting, boring,**

**tunneling, backfilling, the removal of aboveground structures by either explosive or mechanical means, and other earthmoving operations.**

Oasis' Damage Prevention Program was inadequate because it did not have a defined procedure to prevent damage to the pipeline from excavation activities. Specifically, Oasis failed to provide a process to specify how reports of third party damage are checked against One-Call tickets. Oasis submitted updated procedures on 9/13/2018 that satisfactorily addressed this item. No further action is required.

**21. §195.446 Control room management.**

**(a) General. This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by §195.402. An operator must develop the procedures no later than August 1, 2011, and must implement the procedures according to the following schedule. The procedures required by paragraphs (b), (c)(5), (d)(2) and (d)(3), (f) and (g) of this section must be implemented no later than October 1, 2011. The procedures required by paragraphs (c)(1) through (4), (d)(1), (d)(4), and (e) must be implemented no later than August 1, 2012. The training procedures required by paragraph (h) must be implemented no later than August 1, 2012, except that any training required by another paragraph of this section must be implemented no later than the deadline for that paragraph.**

**(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:**

**(1) A controller's authority and responsibility to make decisions and take actions during normal operations;**

Oasis' Control Room Management (CRM) manual was inadequate because it did not have a defined procedure to establish clear processes to describe each controller's physical domain of responsibility for pipelines and other facility assets. Additionally, Oasis failed to require controllers to stay at the console to verify all SCADA commands that have been initiated are fulfilled along with commands given via verbal communications. Oasis submitted updated procedures on 5/7/2018 that satisfactorily addressed this item. No further action is required.

**22. §195.446(a) – Control room management. (see above)**

**(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:**

**(3) A controller's role during an emergency, even if the controller is not the first to detect the emergency, including the controller's responsibility to take specific actions and to communicate with others;**

Oasis' CRM manual was inadequate because it did not have a defined procedure to describe a controller's role during an emergency. Specifically, Oasis failed to develop a process to address the controller's responsibilities in the event the control room must be evacuated. Oasis submitted updated procedures on 5/14/2018 that satisfactorily addressed this item. No further action is required.

**23. §195.446(a) – Control room management. (see above)**

**(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:**

**(4) A method of recording controller shift-changes and any hand-over of responsibility between controllers; and**

Oasis's CRM manual was inadequate because it did not have an adequate procedure to establish clear processes for the hand-over of responsibility between controller's. Specifically, Oasis failed to require that the outgoing controller is responsible to answer the phone during the shift change. Oasis submitted updated procedures on 5/7/2018 that satisfactorily addressed this item. No further action is required.

**24. §195.446(a) – Control room management. (see above)**

**(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:**

**(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that**

**affect pipeline safety are made to field equipment or SCADA displays;**

Oasis' CRM manual was inadequate because it did not have a defined procedure to provide adequate tools, processes and procedures necessary for the controllers to carry out their roles and responsibilities. Specifically, Oasis failed to do the following: 1) Oasis did not have a process in place to adequately define and list safety-related points. 2) Oasis failed to develop adequate processes to describe in detail the point to point process. 3) Oasis failed to develop adequate processes for the thoroughness of the point-to-point verification. Oasis submitted updated procedures on 5/7/2018, 6/4/2018 and 9/13/2018 that satisfactorily addressed this item. No further action is required

**25. §195.446(a) – Control room management. (see above)**

**(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:**

**(3) Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months;**

Oasis' CRM manual was inadequate because it did not have an internal communication plan to provide adequate means for manual operation of the pipeline safely. Oasis submitted updated procedures on 5/14/2018 that satisfactorily addressed this item. No further action is required.

**26. §195.446(a) – Control room management. (see above)**

**(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:**

**(4) Test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months; and**

Oasis' CRM manual was inadequate because it did not have a defined procedure to provide adequate tools, processes and procedures necessary for the controllers to carry out their roles and responsibilities. Specifically, Oasis failed to do the following: 1) Oasis failed to provide a process for development work that takes place on the backup SCADA system. 2) Oasis failed to develop a process to adequately address and test the logistics of transferring control to a backup control room. The original plan did not include a backup control room but relied on mobile totes which were not covered in the procedures. Oasis

has since updated the procedures to include a backup control room. 3) Oasis failed to develop a process to adequately address and test the logistics of returning operations back to the primary control room. Oasis submitted updated procedures on 5/14/2018 that satisfactorily addressed this item. No further action is required.

**27. §195.446(a) – Control room management. (see above)**

**(d) Fatigue mitigation. Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:**

Oasis' CRM manual was inadequate because it did not have defined fatigue mitigation procedures to address the operator-specific fatigue risks. Specifically, Oasis has a 7 on, 7 off schedule which was not included as a fatigue risk. Additionally, Oasis failed to adequately address how the program reduces the risk associated with controller fatigue. Oasis submitted updated procedures on 5/7/2018 that satisfactorily addressed this item. No further action is required.

**28. §195.446(a) – Control room management. (see above)**

**(d) Fatigue mitigation. Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:**

**(4) Establish a maximum limit on controller hours-of-service, which may provide for an emergency deviation from the maximum limit if necessary for the safe operation of a pipeline facility.**

Oasis' CRM manual was inadequate because it did not have defined procedures to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out their roles and responsibilities. Specifically, Oasis failed to do the following: 1) Oasis failed to provide an adequate means to document all scheduled and unscheduled HOS worked, including overtime and time spent performing duties other than control room duties. 2) Oasis failed to develop specific fatigue countermeasures for shifts longer than 8 hours. 3) Oasis failed to develop an adequate process for approving deviations from the maximum HOS limits. Oasis submitted updated procedures on 5/7/2018, 9/13/2018 and 10/1/2018 that satisfactorily addressed this item. No further action is required.

**29. §195.446(a) – Control room management. (see above)**

**(e) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:**

**(1) Review SCADA safety-related alarm operations using a process that ensures alarms are accurate and support safe pipeline operations;**

Oasis' CRM manual was inadequate because it did not have a defined procedure for review of safety-related alarms that accounts for individual-specific controller qualification and performance. Additionally, Oasis failed to provide a list of safety related alarm set points. Oasis submitted updated procedures on 10/1/2018 that satisfactorily addressed this item. No further action is required.

**30. §195.446(a) – Control room management. (see above)**

**(e) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:**

**(4) Review the alarm management plan required by this paragraph at least once each calendar year, but at intervals not exceeding 15 months, to determine the effectiveness of the plan;**

Oasis' CRM manual was inadequate because it did not have a defined procedure to determine the effectiveness of the alarm management plan. Specifically, Oasis failed to do the following: 1) Oasis failed to add to the procedures details on the method of review. 2) Oasis failed to develop adequate criteria for review including chronic and recurring issues. 3) Oasis failed to include a means of record keeping. Oasis submitted updated procedures on 10/1/2018 that satisfactorily addressed this item. No further action is required.

**31. §195.446(a) – Control room management. (see above)**

**(e) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:**

**(5) Monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not exceeding 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms; and**

Oasis' CRM manual was inadequate because it did not have a defined procedure for identifying and measuring the content and volume of general activity being directed to an individual controller. Section 8.8 of the CRM states, "This analysis should be performed once a year, not to exceed 15 months..." rather than it must be done. Additionally, Oasis uses the POEMS workload analysis software which is not mentioned in the procedures. Oasis submitted updated procedures on 10/1/2018 that satisfactorily addressed this item.

No further action is required.

**32. §195.446(a) – Control room management. (see above)**

**(f) Change management. Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing each of the following:**

**(2) Require its field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations.**

Oasis' CRM manual was inadequate because it did not have a procedure to require field personnel and SCADA support personnel to contact the control room when emergency conditions exist. Additionally, the CRM manual procedures that require field personnel and SCADA support personnel to contact the control room when making field changes (for example, moving a valve) that affect control room operations states that personnel "should" contact the control room rather than they "must" contact the control room. Oasis submitted updated procedures on 10/1/2018 that satisfactorily addressed this item. No further action is required.

**33. §195.452 Pipeline integrity management in high consequence areas.**

**(b) What program and practices must operators use to manage pipeline integrity? Each operator of a pipeline covered by this section must:**

**(1) Develop a written integrity management program that addresses the risks on each segment of pipeline in the first column of the following table not later than the date in the second column:**

| Pipeline | Date |
|---|---|
| Category 1 | March 31, 2002. |
| Category 2 | February 18, 2003. |
| Category 3 | 1 year after the date the pipeline begins operation. |

**§195.452 Pipeline integrity management in high consequence areas.**

**(b) What program and practices must operators use to manage pipeline integrity? Each operator of a pipeline covered by this section must:**

**(2) Include in the program an identification of each pipeline or pipeline segment in the first column of the following table not later than the date in the second column:**

| Pipeline | Date |
|---|---|
| Category 1 | December 31, 2001. |

**Category 2** **November 18, 2002.**
**Category 3** **Date the pipeline begins operation.**

Oasis' Integrity Management Program (IMP) was inadequate because it did not have a procedure to require completion of segment identification for Category 3 pipelines prior to beginning of operation. Oasis developed and submitted an updated procedure on 5/18/2018, IMP section 8.4 which discusses identifying could affect segments on Category 3 pipelines prior to commissioning. No further action is required.

**34. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area.**

Oasis' IMP was inadequate because it did not have a written facility integrity management plan. Oasis developed and submitted procedures on 5/18/2018 which satisfactorily addressed this item. No further action is required.

**35. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program:**

**(1) A process for identifying which pipeline segments could affect a high consequence area;**

Oasis' IMP was inadequate because it did not have a procedure to include an analysis of overland spread and water transport of hazardous liquids to determine the extent of commodity spread and its effects on HCAs. Oasis submitted an analysis of overland spread and water transport that is dated 5/18/2018. No further action is required.

**36. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program:**

**(4) Criteria for remedial actions to address integrity issues raised by the assessment methods and information analysis (see paragraph (h) of this section);**

Oasis' IMP was inadequate because it did not have a procedure for the criteria for remedial actions to address the integrity of ILI results. Specifically, Oasis failed to develop a process for the validation of clean runs and to clarify the validation of runs with indications beyond the anomaly section of the IMP plan. Additionally, Oasis failed to provide details for communication or feedback to the vendor on anomalies found and sizing of said anomaly. Oasis submitted updated procedures on 6/11/2018 and 9/13/2018 that satisfactorily addressed this item. No further action is required.

**37. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(g) What is an information analysis? In periodically evaluating the integrity of each pipeline segment (paragraph (j) of this section), an operator must analyze all available information about the integrity of the entire pipeline and the consequences of a failure. This information includes:**

**(1) Information critical to determining the potential for, and preventing, damage due to excavation, including current and planned damage prevention activities, and development or planned development along the pipeline segment;**

**(2) Data gathered through the integrity assessment required under this section;**

**(3) Data gathered in conjunction with other inspections, tests, surveillance and patrols required by this Part, including, corrosion control monitoring and cathodic protection surveys; and**

**(4) Information about how a failure would affect the high consequence area, such as location of the water intake.**

Oasis' IMP was inadequate because it did not have a procedure to require damage

prevention information to be gathered and recorded during pipeline patrols and surveillance and then analyzed. Specifically, Oasis failed to produce a procedure that covers field data collection, high level correlation and analysis of damage prevention data from all available sources. Oasis submitted updated procedures on 6/4/2018 and 9/13/2018 that satisfactorily addressed this item. No further action is required.

**38. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(h) What actions must an operator take to address integrity issues?**

**(1) General requirements. An operator must take prompt action to address all anomalous conditions in the pipeline that the operator discovers through the integrity assessment or information analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity as required in this section. An operator must be able to demonstrate that the remediation of the condition will ensure that the condition is unlikely to pose a threat to the long-term integrity of the pipeline as described in this section. An operator must comply with all other applicable requirements in this part in remediating a condition. Each operator must, in repairing its pipeline systems, ensure that the repairs are made in a safe and timely manner and are made so as to prevent damage to persons, property, or the environment. The calculation method(s) used for anomaly evaluation must be applicable for the range of relevant threats.**

**(i) Temporary pressure reduction. An operator must notify PHMSA, in accordance with paragraph (m) of this section, if the operator cannot meet the schedule for evaluation and remediation required under paragraph (h)(3) of this section and cannot provide safety through a temporary reduction in operating pressure.**

**(ii) Long-term pressure reduction. When a pressure reduction exceeds 365 days, the operator must notify PHMSA in accordance with paragraph (m) of this section and explain the reasons for the delay. An operator must also take further remedial action to ensure the safety of the pipeline.**

Oasis' IMP was inadequate because it did not have a procedure to include the requirements for submitting an IMP notification to PHMSA if Oasis personnel are unable to meet remediation deadlines and cannot provide safety through a pressure reduction. Additionally, the procedure did not address the requirement for an IMP notification when the pressure reduction exceeds 365 days. Oasis submitted updated procedures on 6/11/2018 that satisfactorily addressed this item. No further action is required.

**39. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(h) What actions must an operator take to address integrity issues?—(1) General requirements. An operator must take prompt action to address all anomalous conditions the operator discovers through the integrity assessment or information analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity. An operator must be able to demonstrate that the remediation of the condition will ensure the condition is unlikely to pose a threat to the long-term integrity of the pipeline. An operator must comply with §195.422 when making a repair.**

**(4) Special requirements for scheduling remediation—(i) Immediate repair conditions. An operator's evaluation and remediation schedule must provide for immediate repair conditions. To maintain safety, an operator must temporarily reduce the operating pressure or shut down the pipeline until the operator completes the repair of these conditions. An operator must calculate the temporary reduction in operating pressure using the formulas referenced in paragraph (h)(4)(i)(B) of this section. If no suitable remaining strength calculation method can be identified, an operator must implement a minimum 20 percent or greater operating pressure reduction, based on actual operating pressure for two months prior to the date of inspection, until the anomaly is repaired. An operator must treat the following conditions as immediate repair conditions:**

Oasis' IMP was inadequate because it did not have a defined procedure for temporarily reducing operating pressure for immediate repair conditions. Specifically, Oasis failed to address OPP devices in the field when a pressure reduction is necessary. Additionally, the procedure states the previous 30 day high but the regulations require 2 months. Oasis submitted updated procedures on 6/4/2018 and 6/11/2018 that satisfactorily addressed this item. No further action is required.

**40. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(i) What preventive and mitigative measures must an operator take to protect the high consequence area?—(1) General requirements. An operator must take measures to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area. These measures include conducting a risk analysis of the pipeline segment to identify additional actions to enhance public safety or environmental protection. Such actions may include, but are not limited to, implementing damage prevention best practices, better monitoring of cathodic protection where corrosion is a concern, establishing shorter inspection intervals, installing EFRDs on the pipeline segment, modifying the systems that monitor pressure and detect leaks, providing additional training to personnel on response procedures, conducting drills with local**

**emergency responders and adopting other management controls.**

**(2) Risk analysis criteria. In identifying the need for additional preventive and mitigative measures, an operator must evaluate the likelihood of a pipeline release occurring and how a release could affect the high consequence area. This determination must consider all relevant risk factors, including, but not limited to:**

**(i) Terrain surrounding the pipeline segment, including drainage systems such as small streams and other smaller waterways that could act as a conduit to the high consequence area;**

**(ii) Elevation profile;**

**(iii) Characteristics of the product transported;**

**(iv) Amount of product that could be released;**

**(v) Possibility of a spillage in a farm field following the drain tile into a waterway;**

**(vi) Ditches along side a roadway the pipeline crosses;**

**(vii) Physical support of the pipeline segment such as by a cable suspension bridge;**

**(viii) Exposure of the pipeline to operating pressure exceeding established maximum operating pressure.**

Oasis' IMP was inadequate because it did not have a procedure for evaluating the effects of additional actions to enhance public safety or environmental protection by reducing the likelihood and consequences of releases from pipeline segments. Oasis submitted a process on 6/4/2018 which requires the risk model to be used when evaluating P&M measures and the submission satisfactorily addressed this item. No further action is required.

**41. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(i) What preventive and mitigative measures must an operator take to protect the high consequence area?—(1) General requirements. An operator must take measures to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area. These measures include conducting a risk analysis of the pipeline segment to identify additional actions to enhance public safety or environmental protection. Such actions may include, but are not limited to, implementing damage prevention best practices, better monitoring of cathodic protection where corrosion is a concern, establishing shorter inspection intervals, installing EFRDs on the pipeline**

**segment, modifying the systems that monitor pressure and detect leaks, providing additional training to personnel on response procedures, conducting drills with local emergency responders and adopting other management controls.**

**(3) Leak detection. An operator must have a means to detect leaks on its pipeline system. An operator must evaluate the capability of its leak detection means and modify, as necessary, to protect the high consequence area. An operator's evaluation must, at least, consider, the following factors—length and size of the pipeline, type of product carried, the pipeline's proximity to the high consequence area, the swiftness of leak detection, location of nearest response personnel, leak history, and risk assessment results.**

Oasis' IMP was inadequate because it did not have a procedure for the evaluation of leak detection capabilities and modifying, as necessary, to protect the high consequence area. Oasis submitted updated procedures on 6/4/2018 that satisfactorily addressed this item. No further action is required.

**42. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(i) What preventive and mitigative measures must an operator take to protect the high consequence area?—(1) General requirements. An operator must take measures to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area. These measures include conducting a risk analysis of the pipeline segment to identify additional actions to enhance public safety or environmental protection. Such actions may include, but are not limited to, implementing damage prevention best practices, better monitoring of cathodic protection where corrosion is a concern, establishing shorter inspection intervals, installing EFRDs on the pipeline segment, modifying the systems that monitor pressure and detect leaks, providing additional training to personnel on response procedures, conducting drills with local emergency responders and adopting other management controls.**

**(4) Emergency Flow Restricting Devices (EFRD). If an operator determines that an EFRD is needed on a pipeline segment to protect a high consequence area in the event of a hazardous liquid pipeline release, an operator must install the EFRD. In making this determination, an operator must, at least, consider the following factors—the swiftness of leak detection and pipeline shutdown capabilities, the type of commodity carried, the rate of potential leakage, the volume that can be released, topography or pipeline profile, the potential for ignition, proximity to power sources, location of nearest response personnel, specific terrain between the pipeline segment and the high consequence area, and benefits expected by reducing the spill size.**

Oasis' IMP was inadequate because it did not have a procedure for the determination that an EFRD is needed on a pipeline segment to protect a high consequence area in the event of a hazardous liquid pipeline release. Oasis submitted an updated procedure, IMP section

8 along with a report prepared by Integrity Plus on 5/18/2018 titled "City of Williston and Johnsons Corner Systems HCA and EFRD Analysis" which addressed this issue. The updated procedure and report were found to be acceptable. No further action is required.

**43. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(j) What is a continual process of evaluation and assessment to maintain a pipeline's integrity?**

**(4) Variance from the 5-year intervals in limited situations—**

**(i) Engineering basis. An operator may be able to justify an engineering basis for a longer assessment interval on a segment of line pipe. The justification must be supported by a reliable engineering evaluation combined with the use of other technology, such as external monitoring technology, that provides an understanding of the condition of the line pipe equivalent to that which can be obtained from the assessment methods allowed in paragraph (j)(5) of this section. An operator must notify OPS 270 days before the end of the five-year (or less) interval of the justification for a longer interval, and propose an alternative interval. An operator must send the notice to the address specified in paragraph (m) of this section.**

**(ii) Unavailable technology. An operator may require a longer assessment period for a segment of line pipe (for example, because sophisticated internal inspection technology is not available). An operator must justify the reasons why it cannot comply with the required assessment period and must also demonstrate the actions it is taking to evaluate the integrity of the pipeline segment in the interim. An operator must notify OPS 180 days before the end of the five-year (or less) interval that the operator may require a longer assessment interval, and provide an estimate**

**of when the assessment can be completed. An operator must send a notice to the address specified in paragraph (m) of this section.**

Oasis' IMP was inadequate because it did not have a procedure for submitting an IMP notification to OPS should Oasis require a variance from the five-year assessment intervals based on a reliable engineering evaluation or when Oasis may need a longer assessment period because of unavailable technology. Oasis submitted updated procedures on 6/11/2018 that satisfactorily addressed this item. No further action is required.

**44. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(j) What is a continual process of evaluation and assessment to maintain a pipeline's integrity?**

**(5) Assessment methods. An operator must assess the integrity of the line pipe by any of the following methods. The methods an operator selects to assess low frequency electric resistance welded pipe or lap welded pipe susceptible to longitudinal seam failure must be capable of assessing seam integrity and of detecting corrosion and deformation anomalies.**

**(i) In-Line Inspection tool or tools capable of detecting corrosion and deformation anomalies, including dents, gouges, and grooves. For pipeline segments that are susceptible to cracks (pipe body and weld seams), an operator must use an in-line inspection tool or tools capable of detecting crack anomalies. When performing an assessment using an In-Line Inspection tool, an operator must comply with §195.591**

Oasis' IMP was inadequate because it did not have a procedure detailing how the ILI specification process works with vendors. Oasis developed and submitted procedures on 6/11/2018 and 9/13/2018 which satisfactorily addressed this item. No further action is required.

**45. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(j) What is a continual process of evaluation and assessment to maintain a pipeline's integrity?**

**(5) Assessment methods. An operator must assess the integrity of the line pipe by any of the following methods. The methods an operator selects to assess low frequency electric resistance welded pipe or lap welded pipe susceptible to longitudinal seam failure must be capable of assessing seam integrity and of detecting corrosion and deformation anomalies.**

**(iv) Other technology that the operator demonstrates can provide an equivalent understanding of the condition of the line pipe. An operator choosing this option must notify OPS 90 days before conducting the assessment, by sending a notice to the address or facsimile number specified in paragraph (m) of this section.**

Oasis's IMP was inadequate because it did not have a procedure for submitting an IMP notification to OPS should Oasis personnel decide to use other technology as an assessment method. Oasis submitted updated procedures on 6/11/2018 that satisfactorily

addressed this item. No further action is required.

**46. §195.452(b)(1) – Pipeline integrity management in high consequence areas. (see above)**

**(m) How does an operator notify PHMSA? An operator must provide any notification required by this section by:**

**(1) Sending the notification by electronic mail to** InformationResourcesManager@dot.gov**; or**

**(2) Sending the notification by mail to ATTN: Information Resources Manager, DOT/PHMSA/OPS, East Building, 2nd Floor, E22-321, 1200 New Jersey Ave SE., Washington, DC 20590.**

Oasis' IMP was inadequate because it did not have a procedure for submitting IMP notifications or how to send them to PHMSA. Oasis submitted updated procedures on 6/11/2018 that satisfactorily addressed this item. No further action is required.

**47. §195.505 Qualification program.**

**Each operator shall have and follow a written qualification program. The program shall include provisions to:**

**(c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;**

Oasis' Operator Qualification (OQ) plan was inadequate because it did not use generally accepted values for restrictions and limitations placed on provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual. Oasis submitted updated procedures on 6/4/2018 with corrected span of control on required tasks that satisfactorily addressed this item. No further action is required.

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). Since all the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed in 30 days unless you respond.

It is requested (not mandated) that Oasis Midstream Partners maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Allan C. Beshore, Director, Central, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2018-5011M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

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