



October 13, 2021

Gregory A. Ochs
Director – Central Region OPS
PHMSA
901 Locust Street, Suite 480
Kansas City, MO 64160

VIA: Email to nkauj.her.ctr@dot.gov and gregory.ochs@dot.gov.

RE: Notice of Amendment
CPF 3-2021-050-NOA
BOE Pipeline, LLC

Mr. Ochs:

Pursuant to the provisions of 49 CFR 190, Subpart B, BOE Pipeline, LLC submits the following in response to *Notice of Amendment (NOA) CPF 3-2021-050-NOA*, issued October 6, 2021.

There were 3 unresolved *apparent inadequacies* of the 8 identified in the NOA. These are as follows:

2. *BOE's procedures were inadequate because there was no procedure stating the qualification requirements for non-destructive testing personnel. BOE must amend its procedures to meet the requirements of § 195.234(b)(2).*

Response: The BOE Pipeline, LLC O&M Manual, *Section 6.6.3 – General Welding Guidelines*, has been updated with the following language, to reflect the procedural change addressing this item:

Company representative will confirm that personnel conducting non-destructive testing are trained in the established procedures and in the use of the equipment employed in the testing.

This page from the O&M Manual is attached for your reference.

7. BOE's procedures were inadequate because there was no statement of management support for the public awareness program as required by Section 2.5 of API RP 1162. BOE submitted a statement of management support on April 30, 2021 that is inadequate because there is no statement regarding commitment of management participation and allocation of resources and funding and was not signed by a senior management executive. BOE must further amend its procedures to meet the requirements of Section 2.5 of API RP 1162.

Response: Statement of Management Support has been updated accordingly and is attached for your reference.

8. BOE's procedures were inadequate because no updates have been made to begin integration of the new data elements requirements under § 195.452(g), as amended on October 1, 2019. BOE must amend its procedures to meet the requirements of Amendment. 195-102, 84 FR 52260, Oct. 1, 2019 which were effective October 1, 2020 for § 195.452(g).

Response: Of the 21 data elements identified in 49 CFR 195.452(g) requiring integration prior to October 1, 2022, BOE Pipeline, as of the November 2020 review of the Integrity Management Plan (IMP), had already

integrated 8 of these data elements. Data elements will continue to be integrated during the next IMP review for 2021, with all data elements being integrated prior to October 1, 2022.

Specifically:

- (i) *Pipe diameter, wall thickness, grade, and seam type.* Identified in IMP Element 8 Data Table.
- (iv) *Endpoints of segments that could affect high consequence areas (HCAs).* Addressed in IMP Section 1.4.
- (ix) *Close interval survey (CIS) survey results.* Addressed in IMP Section 6.5.2.
- (xii) *CP test point survey readings and locations.* IMP Sections 2.3.2-B and 6.5.2 address cathodic protection requirements. Annual surveys are conducted by WBI Energy – Corrosion Services. Results of surveys are maintained, as is documentation of corrective actions taken in response to any identified issues.
- (xiii) *AC/DC and foreign structure interference surveys.* Addressed in IMP Table 7-1 and conducted annually by WBI Energy – Corrosion Services.
- (xiv) *Pipe coating surveys and cathodic protection surveys.* Addressed in IMP Section 6.5.2 and Table 7-1.
- (xv) *Results of examinations of exposed portions of buried pipelines (i.e., pipe and pipe coating condition, see §195.569).* Addressed in IMP Section 2.3.2-C and per O&M Manual.
- (xvi) *Aerial photography.* Aerial patrols are addressed in IMP Section 6.5.1-B and Table 7-1. Aerial photographs are provided by pilots and maintained by BOE Pipeline.

A copy of the BOE Pipeline IMP is attached for reference.

Given BOE Pipeline had begun integrating the required data elements identified in 49 CFR 452(g) prior to this inspection being completed, and continues to integrate these data elements, I respectfully request that this finding be removed from the Notice of Amendment.

If you have any questions regarding this response, please do not hesitate to contact me at bmcdowell@boemidstream.com or by phone at (303) 887.8005.

Sincerely,



Brandon McDowell
Director – Operations and Corporate Regulatory Compliance