

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: bill.moler@tallgrassenergylp.com;
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December 22, 2021

William Moler
Chief Executive Officer
Tallgrass Energy, LP
Pony Express Pipeline, LLC
Tallgrass Midstream, LLC
4200 W. 115th St. Suite 350
Leawood, KS 66211

CPF 3-2021-103-NOA

Dear Mr. Moler:

From May 7 – 11, 2018 and December 4 – 6, 2018, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Tallgrass Energy, LP (Tallgrass) procedures for the hazardous liquid Control Room Management procedures and records in Lakewood, Colorado. The inspection team continued to work on completing the inspection by receiving requested items from Tallgrass through 2019.

In addition, completion of this inspection was delayed due to an issue that was brought by a third party against the operator that had a common area of focus with PHMSA's inspection. For this reason, work continued on this inspection from 2019 through October 2021. While the control room management procedures cover additional assets (such as gas transmission), this inspection covered Pony Express Pipeline, LLC OPID 39043 and Tallgrass Midstream, LLC OPID 39216. Additional assets that have become operational since the inspection may be applicable to the amendments requested in the body of this letter.

On the basis of the inspection, and follow-up actions from the complaint, PHMSA has identified the apparent inadequacies found within Alarm Management and Control Room Management plans or procedures, as described below:

1. **§ 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.

Tallgrass's O&M 1100_GL Titled: Control Room Management (CRM) Revised: April 1, 2020, did not adequately develop procedures that describe or define the types of pipeline assets covered by the CRM plan. In the CRM AO1 form provided by Tallgrass, the control room was identified as having hazardous liquid transmission, and did not identify any hazardous liquid gathering operating from the control room. In this same form relevant to this control room, the operator identified gas transmission and gas gathering to be covered by this control room. However, the O&M 1100_GL CRM procedure in the 1. Applicability section identified hazardous liquid transmission and hazardous liquid gathering, and only natural gas transmission. Tallgrass must amend O&M 1100_GL CRM plan to correctly identify the type of pipeline assets cover by the CRM plan.

2. **§ 195.446 Control room management.**
 - (a)
 - (b) Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controllers' prompt and appropriate response to operating conditions, an operator must define each of the following:
 - (1)
 - (2) A controller's role when an abnormal operating condition is detected, even if the controller is not the first to detect the condition, including the controller's responsibility to take specific actions and to communicate with others;

Tallgrass's O&M 1100_GL Titled: Control Room Management Revised: April 1, 2020, and the AO-C Loss of Communication Guidelines was inadequate because it did not provide sufficient direction on how the pipeline will be confirmed by the controller to have shutdown in a safe manner should three or more pipeline facilities suffer loss of communication.

Tallgrass O&M 1100_GL in Section 7.1 references AO-C Loss of Communication (for liquid only) as part of the internal communication plan requirements for manual operation. Section 4.1.3. (b) of Tallgrass O&M 1100_GL CRM plan requires controllers during abnormal and emergency operating conditions to respond to abnormal operations (AO) in alignment with AO Guidelines. However, when reviewing the AO-C Loss of Communication, this document did not provide adequate instruction for controllers when at least three or more facilities (valves or pump stations) have lost communication for 30-40 minutes.

The AO-C Loss of Communication indicates that the pipeline should either be shut down or will automatically shutdown when three or more of the facilities have lost communication for a specific time duration, but it does not include specifics on how the controller is to confirm that this shutdown action occurred safely.

The AO-C Loss of Communication and the O&M 1100_GL requires amendment to address how the controller will determine that the pipeline has been shut down safely in the event of a loss of communication to at least three or more facilities (valves or pump stations).

3. § 195.446 Control room management.

(a)

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

(1)

(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.

Tallgrass's O&M 1100_GL Titled: Control Room Management Revised: April 1, 2020 did not adequately address the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions regarding the Tallgrass Pony Express Pipeline ERP/Oil Spill Response Plan. Specifically, the procedures do not mention the controller roles and responsibilities regarding timelines and communication detailed in the Tallgrass Pony Express Pipeline ERP/Oil Spill Response Plan.

Tallgrass's O&M 1100_GL require an amendment to include controller roles and responsibilities regarding timelines and communication detailed in the Tallgrass Pony Express Pipeline ERP/Oil Spill Response Plan and all other relative oil spill response plans.

4. § 195.446 Control room management.

(a)

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

(1)

(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.

Tallgrass's O&M 1100_GL Titled: Control Room Management Revised: April 1, 2020 Section 4.3 did not adequately address the controller's responsibility to take specific actions and to communicate with others when the pipeline is transporting different commodities. O&M 1100_GL Section 4.1.3 states, *"For calls from the public regarding potential or confirmed leaks or events that could potentially endanger the public, Controllers must caution callers to take appropriate actions to safeguard human life and safety."* While additional guidance may be available for controllers regarding appropriate actions to safeguard human life and safety, this information was not referenced in the O&M 1100_GL CRM plan. Furthermore, information reviewed at the time of the inspection did not address the multiple commodities (such as HVL, crude oil, natural gas, and refined products) operated from this control room for which different appropriate actions are required (upwind of a cloud for example, versus don't hang up the phone for a natural gas system). The O&M 1100_GL CRM plan requires amendment to clarify the appropriate actions by commodity and to reference any guidance associated with these actions.

In addition, the Lakewood 360 backup control room location did not have the same capabilities of the primary control room, such as leak detection. The OCC Evacuation and Resumption Plan, which is applicable when the controller leaves the primary control room location, did not call out the differences between the primary and backup control room locations. Differences in the control room capabilities impact the application of controller roles and responsibilities, especially during an emergency and the tools provided for how controllers would detect a leak. The OCC Evacuation and Resumption Plan and the O&M 1100_GL CRM plan require amendment to address these differences in the control rooms and provide clarification to the controllers regarding roles and responsibility changes in how to detect a leak at the back up control room location.

5. § 195.446 Control room management.

(a)

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

(1)

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

Tallgrass's O&M 1100_GL Titled: Control Room Management Revised: April 1, 2020, Section 9.1 Shift Change Procedures were inadequate because the procedures incorrectly referred to suppressed alarms. While Tallgrass may use other types of alarm inhibit functions, Tallgrass verbally stated suppressing alarms was a function that was not utilized. The O&M 1100_GL CRM plan requires amendment to exclude suppressed alarms (this is not applicable to other alarm inhibit methods) if not utilized as identified during the inspection.

6. § 195.446 Control room management.

(a)

(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:

(1) **Implement API RP 1165 (incorporated by reference, see § 195.3) whenever a SCADA system is added, expanded, or replaced, unless the operator demonstrates that certain provisions of API RP 1165 are not practical for the SCADA system used.**

Tallgrass's O&M 1100_GL Titled: Control Room Management Revised: April 1, 2020, and the HMI Philosophy for Liquids procedures were inadequate because the documents did not clearly define the types of changes to the SCADA system(s) that constituted additions, expansions, or replacements to ensure API RP 1165 would be implemented. For example, a console addition was not defined as an expansion of the SCADA system. This change would result in configuration and logging functions changes especially in regards to alarms that would require programming as part of this expansion or addition.

In addition, O&M 1100_GL CRM plan and HMI Philosophy for Liquids procedures were inadequate because the plans did not indicate how Section 5 of API RP 1165 would be implemented, including for design and performance requirements.

The procedure as amended must define adequately types of additions, expansions, or replacement that would lead to implementation of API RP 1165. The procedure as amended must also identify the records that Tallgrass will utilize to demonstrate compliance and implementation of API RPI 1165.

7. § 195.446 Control room management.

(a)

(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:

(1)

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

Tallgrass's O&M 1100_GL Titled: Control Room Management Revised: April 1, 2020 and the OCC Evacuation and Resumption Plan were inadequate because the procedures did not reference the OCC Backup Site Test Checklist that Tallgrass utilized as one of the records to demonstrate compliance for the back-up OCC/SCADA test.

Redundant servers were part of the backup SCADA system and as such must also be tested. The procedures did not include reference SCADA server tests and the records to demonstrate

compliance of SCADA server tests. The record generated to demonstrate compliance needs to identify which server is being used as the active server at the backup center and identify which server is activated when returning to the primary control room location. The back-up test needs to confirm that the SCADA servers have been switched, shown to be functional, and identify which servers were involved in the switch so that the operator can test the backup servers as well.

The OCC Evacuation and Resumption plan will be utilized when moving between the primary and back up control centers. This can occur when there is a loss of communication. The AO-C loss of communication procedure is referenced by the O&M 1100_GL CRM Plan and as such may result in an OCC Evacuation. The OCC Evacuation and Resumption plan, which would be utilized as part of a backup system test, contains an undefined reference to “Telco”. The procedure must be amended to define the reference to “Telco” and to ensure that it is consistent with AO-C Loss of Communications types of communication services.

8. § 195.446 Control room management.

(a)

(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:

(1)

(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.

Tallgrass’s O&M 1100_GL Titled: Control Room Management Revised: April 1, 2020, were inadequate because the procedure did not address how shift lead's/supervisor’s actual hours worked would be recorded when serving as a qualified controller. Additionally, the procedures did not clarify how the 65-hour maximums in seven sliding days would be identified for leads/supervisors.

Furthermore, Section 10.3 states, all deviations shall be approved by the Supervisor/Lead and documented for review. However, the procedure did not identify who was responsible for approving an hours of service deviation performed by a Lead/Supervisor when acting as a qualified controller.

The procedure must be amended to include a method for tracking actual hours of service for leads/supervisors and to include a process for approving leads/supervisors hours of service deviations.

9. § 195.446 Control room management.

(a)

(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.

Tallgrass's Alarm Management Plan Section 3 was inadequate because the process did not ensure all alarms that support the safe pipeline operation were accurate. Specifically, the Alarm Management Plan did not address volume levels associated with tanks, valves associated with isolation or emergency response requirements, and other specific points that may be identified through special needs (such as special permits, Immediate Shutdown, and the applicability of H2S monitoring activities) or calculated (soft) point alarming. In addition, leak detection alarms were also not included in the Alarm Management Plan.

The procedure requires amendment to include a process to ensure all alarms are accurate and support the safe operation of the pipeline. This includes volume levels associated with tanks, valves associated with isolation or emergency response requirements, leak detection, and other specific points that may be identified through special needs (such as special permits, Immediate Shutdown, and the applicability of H2S monitoring activities) or calculated (soft) point alarming.

10. § 195.446 Control room management.

(a)

(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)

(2) Identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities;

Tallgrass's Alarm Management plan did not adequately address false alarms or points affecting safety that have been forced as part of the monthly alarm reviews. In addition, for forced or manual values, the procedure did not define how the time exceeding that required for the associated maintenance or operating activities would be identified.

The Alarm Management plan required controllers to respond to false or malfunctioning alarms by using the applicable Guideline: AO-F Component Failure or Malfunction Guideline. However, at the time of the inspection, AO-F was incorrectly referenced as the Component Failure or Malfunction Guideline, which is AO-E, not AO-F.

In addition, the Alarm Management Plan requires amendment to include AO-F Leak Detection and Response Guideline as this also addresses actions to take when a leak detection alarm is

determined to be false. The process must be amended to address how false alarms will be consistently documented by the controller.

Furthermore, the Alarm Management Plan references the AO-E Component Failure or Malfunction procedures, which required the controller to document false and malfunctioning alarms in the shift turnover. The Alarm Management Plan, and Section 11.1 of O&M 1100_GL did not clarify how monthly reviews would address false alarms recorded by controllers during shift turnovers (shift reports or controller logs).

Tallgrass must amend its procedures to address the inadequacies identified above.

11. § 195.446 Control room management.

(a)

(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)

(3) Verify the correct safety-related alarm set-point values and alarm descriptions when associated field instruments are calibrated or changed and at least once each calendar year, but at intervals not to exceed 15 months;

Tallgrass's Alarm Management Plan and O&M 1100_GL Section 11.1 were inadequate because the procedures did not define what record would be used to demonstrate compliance for the verification of correct safety-related alarm set-point values and alarm descriptions, when associated field instruments are calibrated or changed at least once each calendar year, but at intervals not to exceed 15 months.

Additionally, the O&M 1100_GL procedure indicated that the Manager or his/her designee will review the alarm system to verify safety-related alarm settings and descriptions. However, the procedures did not explain how the review will be performed and what documentation would be utilized to verify correct alarm setpoint values and alarm descriptors, such as Tallgrass PACs (Proposed Alarm Changes) or Enterprise Management of Change (EMOC).

Tallgrass must amend its procedures to address the inadequacies identified above.

12. § 195.446 Control room management.

(a)

(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)

(6) Address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section.

Tallgrass's Alarm Management Plan and O&M 1100_GL Section 11.1 were inadequate because the plans did not define how deficiencies identified during monthly reviews specific to points taken off-scan would be addressed.

Furthermore, the Alarm Management Plan references AO-E Component Failure or Malfunction procedures which required controller to document false and malfunctioning alarms in the shift turnover. The Alarm Management Plan and Section 11.1 of O&M 1100_GL did not clarify how deficiencies identified by controllers in Shift Reports or controller logs were addressed.

Tallgrass must amend its procedures to address the inadequacies identified above.

13. § 195.446 Control room management.

(a)

(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:

(1) Implement section 7 of API RP 1168 (incorporated by reference, *see* § 195.3) for control room management change and require coordination between control room representatives, operator's management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration;

Tallgrass's O&M 1100_GL titled: *Control Room Management Revised: April 1, 2020* was inadequate because it did not define what types of changes can be processed as an emergency through verbal communications to the controller. A clear process was not defined for how a pressure reduction on an emergency basis is communicated to a controller, and what record would be used to communicate this change to other controllers that may not be on shift at the time of the emergency change. API RP 1168 Section 7 identifies 3 examples of emergency changes (pressure reductions, mainline leaks, and or critical equipment failure). While a Management of Change process did exist in Tallgrass's *OM155_GL Titled: Management of Change*, it was not clear from this procedure what types of emergency changes can be processed verbally (such as an emergency pressure reduction required by Integrity Management). While *O&M 1100_GL Section 12* did address emergency management of change (EMOC) and referenced *OM 155 GL*, EMOC in these documents refers to Enterprise Management of Change and not emergency changes.

Additionally, during the inspection, the operator indicated verbally that Maximum Operating Pressure (MOP) would be available through the Geographic Information System (GIS) and that this was utilized by the controller to determine current MOP and pressure restrictions. However, this was not included as part of the process for emergency changes.

Tallgrass must amend its procedures to address the inadequacies identified above.

14. § 195.446 Control room management.

(a)

(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

(1)

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

Tallgrass's *O&M 1100_GL Titled: Control Room Management Revised: April 1, 2020* was inadequate because the process did not define what records would demonstrate changes in field equipment affecting control room operations coordinated with control room personnel. The procedures did not assure that coordination with the control room occurred before the controller received the alarms and not after receiving alarms.

The following operation and maintenance procedures were not integrated as required by 49 CFR § 195.446(a) at the time of the inspection because the procedures did not require coordination with the control room when making field changes:

- *O&M 301_L Inspecting and Servicing Emergency Valves* must be amended to require coordination with the control room prior to implementing any valve action utilizing this procedure.
- *O&M 703_L Pressure Limiting and Relief Devices Inspections* must be amended in Section 3.1.2 and 3.5.3.3 to require contact with the control room when implementing changes, not after, that would trip the alarm and to require the recording of the alarm setpoint value that activated the alarm in the control room. This procedure required confirmation of an alarm and that the alarm is set at the control system documentation, but nothing required that the values that trip a setpoint level in the control room to confirm analog values had been set correctly. The procedure did not require a document or record to demonstrate compliance and confirm the alarm descriptor.
- *O&M 704_L Overpressure and Overfill Protective Devices* must be amended to also require contact with the control room to coordinate implementing making changes that would trip the alarm and to require the recording of the alarm setpoint value that activated the alarm in the control room. This procedure requires confirmation of an alarm and that the alarm is set at the control system documentation, but nothing requires that the values that trip a setpoint level in the control room for analog values have been set correctly (such as HiHi tank alarm levels). The procedure did not require a document or record to demonstrate compliance and confirm the alarm descriptor.
- *O&M 500_L Pump Station Emergency Shutdown* must be amended to require contact with the control room before any action is implemented that would activate an alarm, and this language should be placed Section 2.0 Scope and stated in 3.7 Alarm Testing.

15. § 195.446 Control room management.

(a)

(h) **Training.** Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:

Tallgrass's *O&M 1100_GL Titled: Control Room Management Revised: April 1, 2020*, did not adequately define the roles and responsibilities to address how cross-training would be accomplished for controllers on the hazardous liquid pipeline systems. For gas operations, this definition was found in *Section 13.4 Gas System Training and Evaluation for New Controllers*. However, this information was not included in the procedure for Hazardous Liquid systems.

In 2019, while performing the inspection on Tallgrass's hazardous liquid facilities for this control room, an additional console had already been set up and was being utilized. In addition, Section 13.2 of the CRM procedures indicated that the controllers would be trained and qualified for the PXP system only. However, the control room also operated the Red Tail assets identified as part of the Tallgrass Midstream (TMID) assets.

Tallgrass's *O&M 1100_GL* procedures require amendment to clarify whether or not cross-training will be performed when more than one console exists in a control room, and how training and qualification requirements will cover liquid assets in addition to PXP.

16. § 195.446 Control room management.

(a)

(h) **Training.** Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:

(1)

(5) **For pipeline operating setups that are periodically, but infrequently used, providing an opportunity for controllers to review relevant procedures in advance of their application; and**

Tallgrass's *O&M 1100_GL Titled: Control Room Management Revised: April 1, 2020* was inadequate because it did not address how Tallgrass will determine operating setups that are periodically, but infrequently used.

Additionally, the *O&M 1100_GL* did not identify the procedures that would be used infrequently such as those required for purging, abandonment, or pigging. The procedures require amendment to address how Tallgrass will determine operating setups that are periodically, but infrequently used and identify the required related 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 Enforcement 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 90 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 Tallgrass Energy Partners, LP maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Gregory A Ochs, Director, Central, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2021-103-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A Ochs
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings

cc: Jennifer Eckles, Director Compliance, jennifer.eckels@tallgrassenergylp.com
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