



February 23, 2021

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

Subject: Plan of Correction
CPF 3-2021-5004M

Dear Mr. Ochs,

NST Express, LLC is submitting this letter in response to your Notice of Amendment dated February 9, 2021 in regards to CPF 3-2021-5004M.

1. §195.402 Procedural manual for operations, maintenance, and emergencies. See NOA document for full details.

NST Response: Since the audit in 2018 NST Express, LLC has conducted annual reviews of the OM&E manual and corrected the issues identified in 2018. The Itemized Table of Contents has been updated to reflect all sections & form #'s (please note that the Forms are now in Section 19, formerly Section 18).

Section 10.6 has been updated to include references to both Form – 8(a) Rectifier Inspection Form and Form – 8(b) Rectifier Maintenance Form. Section 10.6.1 is where the Critical Bond Inspection Form – 8(c) is referenced.

Section 5.4 has been updated to properly reference Form – 4(a). Sections 5.5-5.7 were added to include process steps on how and when to use Form – 4(b) and Form – 4(c).

Section 4.2 was revised to properly reference the Abnormal Operating Conditions section of the manual (Section 2.7).

NST has updated its OM&E to include references of when to notify the Control Room throughout the manual. The Revision Log (Form – 2 in Sec. 19 of O&M) lists what sections this was done in. All other CRM rules required by 195.446 are outlined in the Remote Operations Center (3rd party control room) CRM Manual.

2. §195.446 Control room management. See NOA document for full details.

NST Response: Section 3 of the Remote Operations Center (3rd party control room) CRM manual identifies roles/responsibilities for operators. See attached CRM Manual.

3. §195.446 Control room management. See NOA document for full details.

NST Response: Please see revised Sec. 8.9.7 of the CRM manual and Sec. 2.7.6 of the O&M manual.

4. §195.446 Control room management. See NOA document for full details.

NST Response: Section 8 of the CRM Manual has been updated since the 2018 audit. Please see attached.

5. § 195.452 Pipeline integrity management in high consequence areas. See NOA document for full details.

NST Response: NorthStar has reviewed the 2018 HCA Analysis and will revise Appendix A to identify Alexander Junction as a facility that could affect an HCA, while also noting that both the East and West Yellowstone River Valve Stations are located in direct affect locations.

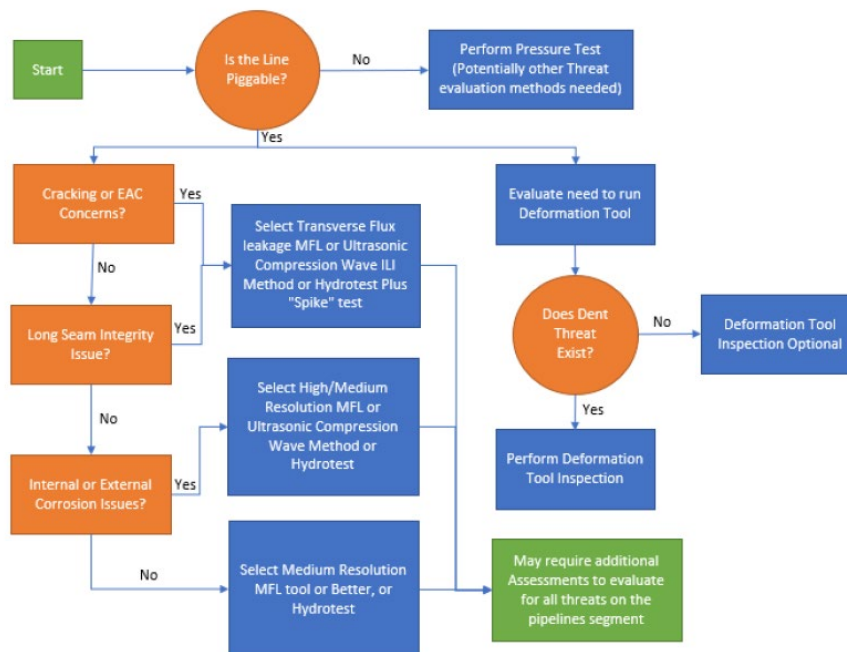
6. §195.452 Pipeline integrity management in high consequence areas. See NOA document for full details.

NST Response: Section 1.4 of the IMP states that the IMT (Integrity Management Team) must meet at least annually to assimilate information collected. Meetings have been held quarterly since 2020.

7. §195.452 Pipeline integrity management in high consequence areas. See NOA document for full details.

NST Response: Figure 4.1 was removed and replaced by the flow chart previously identified as Figure 4.2 (now represented as Figure 4.1 and depicted below). This flowchart identifies hydrotesting as an acceptable method of integrity verification for piggable pipelines, given that certain conditions are met.

Figure 4.1 Assessment Method Selection Process



8. **§195.452 Pipeline integrity management in high consequence areas. See NOA document for full details.**

NST Response:

9. **§195.505 Qualification program. See NOA document for full details.**

NST Response: All references to 192/Gas have been removed from the NST OQ Program since they no longer operate any gas pipeline assets.

10. **§195.505 Qualification program. See NOA document for full details.**

NST Response: NST Express, LLC has updated their OQ Program to include more detail on the processes used for initial and subsequent evaluations. See Section 13.1 and 13.2 of attached OQ Program.

NST Express, LLC is committed to full compliance with the requirements of PHMSA and appreciates your consideration in this matter.