



Via Email to Gregory.Ochs@DOT.gov

October 21, 2022

Mr. Gregory A. Ochs
Director, Central Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106

**RE: CPF No. 3-2022-043-NOPV
Response to NOPV – Rockies Express Pipeline, LLC**

Dear Mr. Ochs:

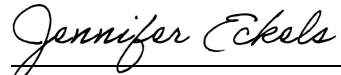
The Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) issued a Notice of Probable Violation (NOPV) and proposed civil penalty to Rockies Express Pipeline, LLC (REX) on September 22, 2022. The NOPV alleges two (2) violations of the federal pipeline safety regulations at Part 192. The two items relate to the self-report of identified external corrosion control survey and data issues made to the Director of Central Region on March 23, 2020. Tallgrass does not contest these items. However, Tallgrass respectfully requests that the Final Order in this case reflect the Company's proactive efforts to resolve the underlying issues and improvements made to its practices and procedures. Those efforts are summarized below.

As listed in detail in the Company's self-report communications (letters dated November 18, 2020, and December 3, 2020, sent to the Director of Central Region) ("Self-Report"), after discovering these issues, Tallgrass took steps to verify that there were no immediate safety concerns. Specifically, Tallgrass initially conducted reads of cathodic protection (CP) test stations and performed an analysis of In-Line Inspection and other inspection and repair data on affected pipeline segments. Results of these efforts confirmed that there were no corrosion-related safety concerns that required remediation under Part 192. Tallgrass then implemented several remedial actions to prevent the recurrence of the corrosion survey and data issues identified in the Self-Report which included providing additional training, improved corrosion data collection and tracking tools, review and amendment of relevant corrosion procedures, establishment of an annual corrosion program performance review meeting and quarterly data reviews, providing additional resources and conducting additional CIS, and other CP system improvements. Tallgrass' efforts have been previously shared in detail with PHMSA over the past year.

Tallgrass shares PHMSA's commitment to pipeline safety and is committed to maintaining the safe operation of its pipeline assets in compliance with the federal pipeline safety regulations. With that commitment in mind, in the interest of cooperation and without admission, Tallgrass elects not to contest either allegation and is providing this response to clarify some of the factual issues underlying the NOPV and confirmation that action has been taken to prevent recurrence.

Please let us know if you have any questions or concerns.

Sincerely,



Jennifer Eckels
Manager – Compliance
370 Van Gordon Street
Lakewood, CO 80228
Phone: (303) 763-3486

cc: Tallgrass: Byron Gale, Jay Meyers, Jarid Kling, Crystal Heter, Nicole Longwell, Esq.
PHMSA: Valerie Schwing