

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: matt@tallgrass.com and Jennifer.eckels@tallgrass.com

July 20, 2023

Mr. Matt Sheehy
President/ CEO
Tallgrass
370 Van Gordon Street
Lakewood, CO 80228

CPF 3-2023-015-NOA

Dear Mr. Sheehy:

From September 3 to November 4, 2022, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected by video conference Tallgrass Interstate Gas Transmission, LLC's (Tallgrass or TIGT) procedures for Control Room Management in Lakewood, Colorado.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within Tallgrass's plans or procedures. The items inspected and the inadequacies are described below:

1. § 192.631 Control room management.

(a) General.

(1) 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, except that for each control room where an operator's activities are limited to either or both of:

(i) Distribution with less than 250,000 services, or

(ii) Transmission without a compressor station, the operator must have and follow written procedures that implement only paragraphs (d) (regarding fatigue), and (i) (regarding compliance validation), and (j) (regarding compliance and deviations) of this section...

(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 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)....

(5) The roles, responsibilities and qualifications of others to direct and supersede the specific technical actions of a controller.

Tallgrass' procedure OM110_GL September 1, 2022 Section 3.6 was not adequate to define the qualifications of the Supervisor who was designated as having authority to direct or supersede the technical actions of a Controller. The procedure states, "[O]CC leads are trained and authorized through Operator Qualification to perform all duties assigned to controllers." It also states, "[T]he Leads and Supervisors have the expertise to know when conditions or situations warrant the necessity to use their authority to direct or supersede the technical actions of a Controller." The procedure was not clear if Supervisors are Operator Qualified. If the supervisors were not Operator Qualified, as Controllers, then Tallgrass needs to define what qualifications validate someone to have the expertise to direct or supersede the technical actions of a Controller.

The procedure must be amended to include the qualifications of the Supervisor who has the authority to direct or supersede the specific technical actions of a Controller.

2. § 192.631 *Control room management*

(a)....

(c) Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities tht operation has defined by performing the following:

(1)....

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

Tallgrass procedures OM1100_GL September 1, 2022 4.8.2 and 4.8.3 were not adequate to provide instructions for testing and documenting a thorough test of their SCADA backup systems. Step 4.8.2 stated, "[A]t a minimum, backup SCADA system testing will include command and set point entry processes and testing for the incoming telephone numbers that route to the OCC." Step 4.8.3 stated, "[Backup site test forms encompass many critical items to be tested but generally test at a minimum, the following items: Phones, Business Computers, SCADA equipment and server connection, Leak Detection function." 4.8.3 also directs the reader to document the tests using OCC Backup Site Checklist.

The records, provided for review, indicated the date but did not include the personnel performing the test or the start and end time of the test. It also did not include which control room (GT or HL) or which consoles were represented by the test. For each calendar year (2019, 2020 and 2021) the form changed and there were inconsistencies with how the form was to be completed between years. In 2020, the form was filled with checkmarks and handwritten notes. There was a note on the top of the form related to the local control room. It was unclear if this form was related to the offsite or local test. In 2021, there were no checkmarks, but there was a column

that indicated the test or applications were functioning. The 2019 record also had “Y” in a column labeled "OK?" This column had no title in the 2020 and 2021 forms. Procedure OM1100_GL September 1, 2022 Section 4.8.2 and 4.8.3 stated, OCC backup tests “[w]ill be done using the OCC Backup Site Checklist and will be retained on the CRM SharePoint site and corrective actions will be implemented as needed.”

It was noted during the 2020 test that TIGT business only had 1 monitor and the “back of PC doesn't have port for 2nd connection." In the 2021 testing record, a note stated, "Need a DVI to Display Port for second Business Monitor on TIGT Console." It appears this issue was not corrected, as required by the procedure, before the next test was performed. There was nothing on the form to document the follow-up.

CRM Plan 4.8.2 stated, "Point-to-Point activities conducted during daily operations in the Backup Control Room will be noted as suitable for fulfilling the annual SCADA system testing.” The procedure required the OCC Backup Site Checklist be completed for all tests. It did not include documentation that indicated the event was actual, team training exercise or a point to point. Also completing the task in the compliance data file is not adequate documentation for compliance. Section 4.8.3 states that at a minimum phones, business computers, SCADA equipment and server connection and leak detection function were needed for a test. There is typically much more in a control room operation that must function. For example, the IT system for emails, scheduling nominations, one call notifications, procedure references phone lists, etc. Also other functions such as printers, lighting, alarm event logging, communications, etc. The check list includes many more items than the minimum, they are all important to the operation.

The procedure needs to be amended to provide more instruction to complete the form under the different scenarios and also to evaluate the critical functions that need to be tested. It should also include documentation related to follow-up on items identified as not functioning or in need of correction or repair.

3. § 192.631 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) Establish communications between control room representative, operator's management and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration;

Tallgrass's procedure OM110_GL September 1, 2022 Section 7 was not adequate because it did not reference and describe the Project Management In Service Process employed by Tallgrass to discuss projects. Tallgrass had a change management process for the control room and the corporate enterprise. Tallgrass also had a Project Management In Service Process group that meets weekly. A project management tool was developed, and the individual groups were identified on the tool. Control room leadership (director, supervisor, leads) attended these

meetings to learn about new projects, update the group on progress and state their concerns. OM110_GL September 1, 2022 Section 7 did not describe or reference this process. Tallgrass indicated that when Maximo is implemented this Project Management In Service Process will not be used.

The procedure needs to be amended to include the Project Management In Service Process in CRM procedures, either as a referenced procedure or included in the CRM Plan. It must also include a description of the roles and responsibilities the control room leadership has in those weekly meetings. As Maximo is implemented into the system, that process needs to be developed to include how the control room will be notified of changes and how leadership interacts to effectively implement the changes.

4. § 192.631 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)....

(6) Control room team training and exercises that include both controllers and other individuals, defined by the operator, who would reasonably be expected to operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations. Operators must comply with the team training requirements under this paragraph by no later than January 23, 2018.

Tallgrass's CRM procedure OM110_GL September 1, 2022 Section 9.15 was not adequate because it did not define the frequency of Team Training for individuals required to participate in the training. The procedure identified the job roles of those who collaborate with controllers as "others." There was discrepancy in the section language about when training is required. One sentence stated, "Depending on the training exercise scenario, the following non-OCC personnel may also be included in the training exercise: Field Operations, SCADA, Systems Engineering, Engineering, Measurement, NOC, EHS, and Media Relations." This could result in no one attending training, depending upon the criteria. Then, in the paragraph below, it stated, "Individuals identified above will participate in at least one team training exercise once per calendar year, not to exceed 15-months, thereafter." Since training is required annually, the operator would need to require all individuals identified as "others" participate in team training. If there is another frequency, for example every 3 years, then the procedure could support some percentage of "others" be trained each year, so all get trained in the course of the three years.

The procedure must be amended to clearly state the required interval for team training and require attendance for those identified who operationally collaborate with controllers (control room personnel) during normal, abnormal or emergency situations.

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 30 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 that Tallgrass 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 Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2023-015-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

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

cc: Jennifer Eckels, Manager Compliance, Jennifer.eckels@tallgrass.com