



Electronically Received
on 01/04/2024

Via email

January 2, 2024

Mr. Gregory Alan Ochs, Director
Central Region, Office of Pipeline Safety
U.S Department of Transportation
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: Lambda Energy Gathering LLC [OPID #: 40028] Response to Notice of
Amendment – CPF No. 3-2023-024-NOA

Mr. Ochs:

Lambda Energy Gathering LLC (Lambda) is in receipt of your Notice of Amendment dated December 27, 2023, in which the following inadequacies were identified:

1. Procedures to protect against ignitions arising out of static electricity, lightning, and stray currents during operation and maintenance activities involving aboveground breakout tanks in accordance with API RP 2003, as required by 49 C.F.R. §195.405(a).
2. Requirement for maintaining adequate firefighting equipment at breakout tank areas, as required by 49 C.F.R. § 195.430.

As referenced in your Notice of Amendment, CPF No. 3-2023-024-NOA, the above inadequacies have been addressed and submitted to PHMSA with no further action required as stated in your correspondence. Pursuant to guidance provided by PHMSA in the document titled “Response Options for Pipeline Operators & Excavators in Enforcement Proceedings”, section II.a., Lambda is not contesting the Notice of Amendment and has incorporated recommended changes into our operations manual.

Lambda greatly appreciates the guidance and learning aspects provided through this inspection of enhancing our written Operations, Maintenance and Emergencies (OM&E) manual.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Harry C. Faulkner', is written over a light blue horizontal line.

Harry Faulkner, President
Lambda Energy Gathering LLC
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