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July 15, 2024

U.S. Department of Transportation
Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration (PHMSA)
ATTN: Gregory A. Ochs, Director, Central Region
901 Locust Street, Suite 480
Kansas City, MO 64106

RE: Response to CPF 3-2024-017-NOA

Dear Mr. Ochs,

Caliber has reviewed the Subject NOA and appreciates the opportunity to respond to PHMSA regarding the findings noted.

After the audit was completed, the Caliber Team determined that the best approach to address the many noted issues with procedures and records was to remove Everline as the third-party control room and begin contractual agreement with a compliant control room instead. Caliber has now transitioned the Spring Creek asset into the Midstream Integrity Services (MIS) control room and is actively working to move Rawson and Bear Den in as well. Throughout this process, we have been in communication with PHMSA and appreciated all of the feedback we received to ensure the transition was addressing all potential concerns.

The Caliber Team has reviewed the referenced findings and would like to request the following to ensure that we fully address every item successfully:

- Based on the move to MIS, Caliber will not be requesting any Everline documentation for response. Instead, we would like to work with MIS directly to provide PHMSA with MIS procedures that address each of the listed concerns. We will, however, share the results with Everline for transparency.
- Though Caliber has already completed a comprehensive compliance update to both the O&M and FRP, we have also been updating the impacted manuals with the proper MIS cross references now that MIS operation of the system is implemented.
- We will also continue in the future to coordinate a comprehensive review of the impacted O&M and FRP procedures referenced with Operations, Maintenance, Compliance, and MIS personnel. This will ensure that we have the proper SME input and do not run the risk of a conflict within the procedures.
- Caliber will respond to each identified item in the NOA with a detailed response on how the issue was resolved and will provide the associated procedures, approved by the proper personnel and finalized.
- Caliber will also ensure that all impacted personnel are trained on any revised procedures and will send those records as well.

Caliber is requesting 90 working days from receipt of the NOA (**November 8, 2024**) to provide the above proof to PHMSA that Caliber is dedicated to the safe (and compliant) operation of our pipeline systems.

Sincerely,

Jonathan d'Augereau
Director of Regulatory, Safety, and Compliance
Caliber Midstream