



By Electronic Mail

July 5, 2024

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

Re: CPF 3-2024-021-NOA

Dear Mr. Ochs:

Pursuant to 49 C.F.R. § 190.208, Crestwood Midstream Partners L.P. (CMPLP or Company) submits this written response to a Notice of Amendment (NOA) issued on June 5, 2024, by the Pipeline and Hazardous Materials Safety Administration (PHMSA) and received by CMPLP on that same day. The PHMSA NOA identified fifteen (15) areas of apparent inadequacies in the CMPLP plans and procedures related to Control Room Management (CRM). The NOA provided for 30 days from receipt to respond; thus, this response is timely.

By way of background, this Notice was issued following an inspection of the CMPLP Colt Hub control room pipeline system in North Dakota via video conference from March 29, 2021 through January 11, 2023.

Since the time of the inspection, CMPLP including the Colt Hub facility was acquired by Energy Transfer Company (ET). As a result, the Colt Hub facility control has been moved to the consolidated remote-control center of ET located in Houston, TX. Moving forward, the control room operations for the Colt Hub will be governed by the ET CRM Plan and associated procedures and the Colt Hub CRM Plan reviewed by PHMSA over the dates identified above will be retired. A required 49 C.F.R. 195.64 Notification will be made to PHMSA regarding this change. As such, this response addresses the PHMSA findings of plan and procedural inadequacies by demonstrating how the ET CRM Plan and associated procedures address these findings.

Please note that this submission contains certain confidential business information and confidential security information that is protected from public disclosure under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. As such CMPLP is supplying both a redacted and unredacted version of this response. In the redacted version certain portions of the written response have been redacted, however, the attachments included with both versions of the response have not been redacted as CMPLP considers all of the attachments to be confidential business information and confidential security information. This information is customarily kept private by CMPLP due to the fact that it contains confidential processes, policies, and procedures that are unique to CMPLP and could provide a competitive disadvantage if disclosed to its competitors and the general public. Should PHMSA receive a FOIA request for this information, the Agency is required to notify CMPLP and provide the Company with an adequate opportunity to substantiate its claim, prepare redactions, and/or object, if warranted.



The Company appreciates PHMSA's review and consideration of this submission and shares PHMSA's commitment to pipeline safety, public safety, and pipeline integrity. Should you have any questions or desire to schedule a meeting to review any and all of this response including the associated attachments please contact me at (713) 989-7126 or via email at todd.nardozzi@energytransfer.com.

Sincerely,

Todd
Nardozzi
Todd Nardozzi
Director – DOT Compliance

Digitally signed
by Todd Nardozzi
Date: 2024.07.05
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cc: Todd Stamm, SVP Operations
Matthew Stork, VP Tech Services