VIA ELECTRONIC MAIL TO: Gregory.Ochs@dot.gov, nkauj.her.ctr@dot.gov, ryan.mcclure@dot.gov, Mia.Petrucci@dot.gov

April 12, 2024

Gregory A Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

CPF 3-2024-025-NOA

Dear Mr. Ochs:

In response to your notice issued March 15, 2024, DT Midstream has elected to provide the following response. This response includes no contest with three of the five allegations made in your notice. We are also providing proof that requested amendments were made. DT Midstream shall be contesting two of the allegations made and are providing a written explanation and reasoning in support of our position.

Allegation #1: DT Midstream's Construction Specification MS-ENG-040, Section 17 – *Pressure Testing* requires modification to properly describe an acceptable number of tie-in welds.

Contesting

Explanation: DT Midstream's specification "MS-ENG-040, Section 17- Pressure Testing" defines a "Tie-In" in Section 17.4 as "Any welded joint to be completed after all pressure tests and therefore not pressure tested prior to being put into service". Section 17.5.8 specifically limits the maximum number of "Tie-In" welds to seven (7) for piping assemblies subjected to a preinstallation pressure test. DT Midstream's specification of seven (7) "Tie-In" welds is an essential allowance for the safe installation of pretested, fabricated assemblies into existing facilities in consideration of the following:

- Worker safety – minimizing carrier pipe or structural support stresses that can cause sudden movement during pipe alignment to mitigate the potential for worker injury risks.
- Reduction of pipe stress – allows installers to join new, pre-tested assemblies to existing piping systems without creating external bending or torsional stresses within the pipe during alignment and fit up.
- Complexity of existing facilities – provide sufficient flexibility for piping modifications within limited space that will minimize concerns of pipe or pipe coating damage during installation as well as from working with and in close proximity to in-service piping.
- All "Tie-In" welds shall receive 100% non-destructive testing prior to placement into service.

Based upon this explanation, we respectfully request that the proposed NOA be dismissed.

Allegation #2: DT Midstream's Construction Specification MS-ENG-040, Section 17 – *Pressure Testing* requires modification to properly describe an acceptable length of a short section.

No Contest

Explanation: The definition of "Short Section in DTM's Construction Specification Section 17 – *Pressure Testing* has been revised to the following:

> "Any section of pipe(s), fitting(s) or fabricated assemblies, totalling less than 250 feet in length which can be visually inspected throughout the entire duration of the test."

In light of PHMSA's acceptance of Panhandle Energy's NOA response in 2011 (CPF 3-2010-1006M) of up to seven (7) pipe joints as a short section, DTM is now well within an established acceptable length for short segments.

Allegation #3: DT Midstream's Transmission Integrity Management Plan (TIMP) does not address the time frame for integrating newly identified segments or HCAs into the Baseline Assessment Plan as required by § 192.911(a).

Contesting

Explanation: DT Midstream's TIMP Procedure 902 – *High and Moderate Consequence Area Identification*, Section 5.3 *Identification of HCAs and MCAs* includes the following language:

> *"New HCA and MCA identification will follow this procedure. If a new HCA or MCA is identified, it must be incorporated into Form 903-001, the Company's Baseline Assessment Plan (BAP), within one (1) year from the date the area is identified, and a baseline assessment will be completed within ten (10) years from the date the HCA or MCA was identified."*

This language was in place since the May 2021 revision to DTM's TIMP and as such was in place at the time of the inspection. Therefore, we respectfully request that the proposed NOA be dismissed.

Allegation #4: DT Midstream's Transmission Integrity Management Plan does not address the requirement to comply with the requirements of ASME/ANSI B.31.8S, Section 12. Specifically, DTM's TIMP failed to identify documentation requirements for internal auditing for quality assurance, as required by § 192.911(l).

No Contest

Explanation: DT Midstream's TIMP Procedure 901 – *Quality Control Plan*, Sections 7 & 8 specify that the results of Internal Auditing, as well as the other components and reviews included in the **Annual Integrity Management Review and Report** are to be documented on DTM TIMP Form 901-002. Form 901-002 already has an entry line on Sheet 1 for "Reviews" which includes "Audits, Evaluations, Etc". as well as "Findings". A reference to the TIMP Procedure 908, *Performance Plan* is also referenced. To further clarify our process and documentation, Sheet 3 has been added to this form to allow for more transparency when listing audit findings and tracking of how they are addressed.

Allegation #5: DT Midstream's Transmission Integrity Management Plan does not address the requirement to define a process for defining the responsibility and the qualifications of individuals reviewing assessments via pressure test, as required by § 192.907(a) and § 192.915.

No Contest

Explanation: DT Midstream's TIMP Procedure 901 – *Quality Control Plan*, Section 5.1 has been revised to include the following wording:

*"**Assessment personnel.** Those conducting assessments (e.g., hydrotest, corrosion inspection) and evaluating results must meet appropriate training, experience, and qualification criteria. For ILI evaluations, a minimum qualification of Level III ILI Data Analyst per ANSI/ASNT ILI-PQ 2005 (2010) is necessary. Personnel reviewing and accepting hydrotesting assessment results shall be qualified through a mixture of training and/or experience with the application of hydrotesting standards as outlined in ASME B 31.8. This will include at least three (3) years of ASME B 31.8 experience. A professional engineer's license may be substituted for the required experience."*

DT Midstream believes these changes address PHMSA's requirements. DTM remains committed to the safe operation of its pipeline system. Please feel free to contact me if you have any questions.

Sincerely,

Mr. Christopher Zona
Chief Operating Officer, DT Midstream

Attachment: DTM TIMP Form 901-002

Cc: Philip Coleman, DT Midstream Director of Codes & Regulatory
Patrick Raichel, DT Midstream Manager of Codes & Compliance

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