

July 1, 2024

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

Re: Alliance Pipeline L.P.'s Notice of Amendment (CPF 3-2024-029-NOA)

Dear Mr. Ochs,

Alliance Pipeline L.P. (Alliance) values the partnership it has with the Pipeline and Hazardous Material Safety Administration (PHMSA) in assuring public safety and regulatory compliance. Alliance continues to maintain plans, procedures, and standards that meet or exceed PHMSA regulations while maintaining a safety culture that proactively promotes and recognizes operational compliance as a top priority.

This letter is confirming the receipt of the "Notice of Amendment" regarding apparent inadequacies found by PHMSA representatives within the Alliance plans and/or procedures during the inspection of Alliance's Control Room Management Program from July 26th, 2023, through September 14th, 2023. Alliance appreciates PHMSA's efforts during the audit and the valuable input regarding areas to improve our plans and procedures. We find this process useful to further refining our Pipeline Safety Programs.

Regarding NOA #1 (§192.631 (b)) stating that "Alliance's procedures need to be amended to include further definition of mid-shift turnover requirements, verification of the inactivity alarm and its inclusion in the procedure if required, formalization of the practice of what happens when a controller becomes incapacitated, and limitation to how long a stand-in controller can operate remotely."

- 1) Alliance is not contesting the Notice and will be amending the procedures to address the inadequacies.
- 2) Alliance is submitting this written request for an extension of time to complete the amendments to procedures to address the inadequacies regarding NOA #1.
 - a. Alliance is requesting a November 1, 2024, time extension to complete the amendments.
 - b. Effective April 1, 2024, 100% of the equity interest in Alliance Pipeline L.P. is now owned by Pembina U.S. Corporation and Fort Chicago Pipeline II US L.P.

Pembina Pipeline Corporation
4000, 585 – 8th Avenue S.W., Calgary, Alberta Canada T2P 1G1
Telephone: (403) 231-7500 Fax: (403) 237-0254

("Pembina"), which acquired the remaining equity interests in Alliance Pipeline L.P. from their partner EIF US Holdings Inc. ("Enbridge").

- i. To facilitate an orderly transition in operations, Enbridge will be providing operations transition support for a period of up to 12 months.
- ii. During the transition period, Control Room procedures will continue to follow existing documented practices, supported by Enbridge policies and systems.
 - o Pembina is in the process of transitioning Alliance to Pembina procedures, resource constraints as well as our ongoing transition demands moving Gas Control to Pembina will require the additional time requested (November 1, 2024) to address the inadequacies to ensure compliance within Pembina procedures.

Regarding NOA #2 (§192.631 (d)) stating that "Alliance's CRM Plan section 5 was not adequate to identify operator specific fatigue risks, per § 192.631(d). Specifically, section 5 only provided consequences of fatigue rather than the operator specific risks that can cause fatigue. The risks should be identified in the procedure and used to develop mitigation strategies." Alliance procedures need to be amended to identify operator specific fatigue risks.

- 1) Alliance is not contesting the Notice and has amending the procedures to address the inadequacies.
 - a. Post-inspection, Alliance amended the procedure to identify fatigue risks. This was reviewed and determined to be adequate by PHMSA.
 - b. PHMSA has noted that no further action is required to address NOA #2.

Regarding NOA #3 (§192.631 (h)(6)) stating that "Alliance's CRM Plan section 9, subsection 4.3.13.4.4, was not adequate to identify 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, per the requirements of § 192.631(h)(6). Specifically, section 9 stated "list of personnel required to participate in CRTT (Team Training) is maintained in the Learning Management (LMS) system." CRM Plan section 11, subsection 4.2.2.12, referenced Appendix D of the CRM Plan, which listed groups that support the control room. This section detailed a task assigned to a supervisor under workload management that stated, "develop and maintain a list of internal and external resources necessary for the Control Room to meet its operational objectives, that shall include functional area, and position/job title (Appendix D)." While this is a reasonable list, it was not intended to define who collaborates with the control room for the purpose of Team Training." This definition should be included in the CRM Plan. The procedure needed to be amended to include the groups and general job titles of individuals who operationally collaborate with control room personnel to augment the procedure and clarify who should be included in the LMS system for Team Training. This addition would ensure that, if there

are groups that need to be added or deleted, the procedure review will drive the LMS list modifications.

- 1) Alliance is not contesting the Notice and has amending the procedures to address the inadequacies.
 - a. Post-inspection, Alliance provided amendments to the procedure and a new Appendix E, to include job groups and titles of individuals who operationally collaborate with control room personnel. This was reviewed and determined to be adequate by PHMSA.
 - b. PHMSA has noted that no further action is required to address NOA #3.

If you need further information or clarification regarding this matter, please contact Bob Bachmeier at (701) 394-9722 (office) or (701) 509-1626 (cell).

Sincerely,

A handwritten signature in black ink that reads "Bob Bachmeier".

Bob Bachmeier
Specialist, Regulatory Pembina US
Pembina Pipeline Corporation
BBachmeier@Pembina.com

CC:

Scott Seibert, Manager, Environment, Operations & Compliance U.S.
Jeff Finch, Sr. Advisor, Regulatory Pembina US
Christian Lucas, Supervisor, Alliance Gas Control
Heather Christie-Burns, Vice President, Transmission Pipelines
Ian Hunt, Director, Gas Operations
John Stevenson, Director, Sustainability, Environment & Regulatory