



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety**

901 Locust Street, Suite 480
Kansas City, MO 64106

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: matt@tallgrass.com;
crystal.heter@tallgrassenergyllp.com; danielle.stephens@tallgrass.com

April 12, 2024

Mr. Matt Sheehy
Chief Executive Officer
Tallgrass Energy, L.P.
4200 W. 115th St. Suite 350
Leawood, KS 66211

CPF 3-2024-034-NOA

Dear Mr. Sheehy:

From May 22 to June 8, 2023, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Tallgrass Energy, L.P.'s (Tallgrass) procedures for the new gas integrity rule¹ in Lakewood, Colorado.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within Tallgrass's plans or procedures. The items inspected and the inadequacies are described below:

1. § 192.506 Transmission lines: Spike hydrostatic pressure test.

(a) Spike test requirements. Whenever a segment of steel transmission pipeline that is operated at a hoop stress level of 30 percent or more of SMYS is spike tested under this part, the spike hydrostatic pressure test must be conducted in accordance with this section.

(1)

(4) After the test pressure stabilizes at the baseline pressure and within the first 2 hours of the 8-hour test interval, the hydrostatic pressure must be raised (spiked) to a minimum of the lesser of 1.5 times MAOP or 100% SMYS. This spike hydrostatic pressure test must be held for at least 15 minutes after the spike test pressure stabilizes.

¹ Docket No. PHMSA–2011–0023; Amdt. Nos. 191–26; 192–125 Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments (86 Fed. Reg. 63266 (Nov. 15, 2021)).

Tallgrass' procedure, entitled "OM1600_GL Strength and Leak Testing" (O&M Procedure), referenced a form that did not indicate the correct time for holding the spike hydrotest nor did it reference the option to go to 1.5 times the maximum allowable operating pressure (MAOP). O&M Form OM1600_01 GL (O&M Form) which is referenced in O&M Procedure section 6.1.1 is the form Tallgrass requires to be filled out to document the test. However, the O&M Form indicated that the spike test was typically from 10 to 30 minutes and did not reference the option to go to 1.5 times the MAOP. Although section 4.1.1 of the O&M Procedure indicated the correct time frame for the spike test hold and also included the 1.5 times the MAOP option, the O&M Form must be revised to match Tallgrass's procedure and the requirements of § 192.506(a)(4).

2. § 192.607 Verification of Pipeline Material Properties and Attributes: Onshore steel transmission pipelines.

(a)....

(c) Verification of material properties and attributes. If an operator does not have traceable, verifiable, and complete records required by paragraph (b) of this section, the operator must develop and implement procedures for conducting nondestructive or destructive tests, examinations, and assessments in order to verify the material properties of aboveground line pipe and components, and of buried line pipe and components when excavations occur at the following opportunities: Anomaly direct examinations, in situ evaluations, repairs, remediations, maintenance, and excavations that are associated with replacements or relocations of pipeline segments that are removed from service.

Tallgrass' procedure "SOP-AI9" section 2.1.5, which is referenced in Tallgrass' procedure "OM_210G Material Verification," did not contain enough guidance for verifying the material properties of buried line pipe and components when excavations occur. Specifically, section 2.1.5 did not contain a process detailing how Tallgrass would coordinate between the field personnel and the integrity personnel to verify pipe data at planned excavations opportunistically. Additionally, during PHMSA's inspection, Tallgrass personnel indicated that Tallgrass defined opportunistic digs as "opportunities to gather information from the same excavation." Section 2.1.5 did not include this as part of Tallgrass's description of opportunistic digs and it should be expanded to better reflect that.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Enforcement Proceedings.

Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of

the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested that Tallgrass maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Gregory A. Ochs, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 3-2024-034-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: Danielle Stephens , DOT Compliance Primary, Tallgrass Energy, L.P.,
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Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*