



May 9, 2024

Mr. Gregory Ochs  
Director – Central Region  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
901 Locust Street, Suite 480  
Kansas City, MO 64106  
[Gregory.Ochs@dot.gov](mailto:Gregory.Ochs@dot.gov)

[Via Email]

RE: CPF 3-2024-034-NOA – GRIT Inspection

Director Ochs,

In response to the above referenced Notice of Amendment (NOA) issued by the Pipeline and Hazardous Materials Safety Administration ("PHMSA" or "the Agency") on April 12, 2024, Tallgrass Energy ("Company") is providing a response to each item 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.**

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).

**Tallgrass Response:** Updates have been made to the referenced OM1600\_GL – Strength and Leak Testing (Spike Testing tab) and is provided as an attachment to this response.

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.***

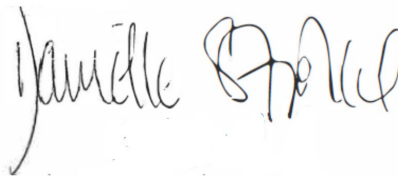
Tallgrass' procedure "SOP-A19" section 2.1.5, which is referenced in Tallgrass' procedure "OM\_210G Material Verification," did not contain enough guidance for verifying the material properties of buried line pipe and components when excavations occur. Specifically, section 2.1.5 did not contain a process 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.

**Tallgrass Response:** Updates have been made to the referenced SOP-A19 as follows and is provided as an attachment to this response:

- Section 2.2 – NEW – Land Disturbance Notifications
  - Describes the review that Asset Integrity has to complete for LDNs that are submitted where pipe will be exposed
- Section 2.3 – REVISED – Opportunistic Testing
  - Mirrors updated language in OM210\_G Material Verification which has specifics for what is and is not considered a situation for opportunistic testing
- Section 3.1 – REVISED – Roles and Responsibilities
  - Format is now tabular and matches the new OM format
  - Updated responsibilities
- Section 4.2.3.4 – NEW – Procedure for non-destructive testing
  - In the past we have used procedures specific to MMT/Frontics and to the company that performed the testing.
  - Language added that follows the basic steps for non-destructive testing (prep, test, clean-up)

Tallgrass Energy is committed to operating its pipeline systems safely and in compliance with all applicable regulations. If you have further questions, please feel free to contact myself on 713.725.0147.

Sincerely,



Danielle Stephens  
Director, PHMSA Compliance

Tallgrass Energy  
370 Van Gordon Street  
Lakewood, CO 80228-1519

cc: Matt Sheehy, Chief Executive Officer  
Crystal Heter, Chief Operating Officer  
Nicole Longwell, Associate General Counsel & CCO (Operations)  
Kale Stanton, Vice President, Asset Integrity

List of Attachments:

- O&M Form OM 1600-01\_GL – Strength and Leak Testing
- SOP-A19 – Material Verification Plan