



December 17, 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

[Via Email]

RE: CPF 3-2024-041-NOA – REX

Director Ochs,

The Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) issued a Notice of Amendment (NOA) on November 22, 2024 to Rockies Express Pipeline LLC (REX) after inspecting procedures for operation and maintenance, corrosion control, and integrity management in Denver, Colorado from February 2, 2023 to December 10, 2023.

In response to the above referenced NOA Tallgrass is providing a response to each item below.

1. **§ 192.13 What general requirements apply to pipelines regulated under this part.**
 - (a)
 - (c) **Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.**

REX's manual of written procedures was inadequate because it did not make clear when the operating procedures required to be established under this part were required to be followed, per the requirements of § 192.13(c). Specifically, REX's procedures failed to ensure all appropriate company requirements were met prior to starting up a new or changed facility because they did not properly define commencement of operations (e.g., pipeline startup).

PHMSA found that REX utilized its Operations & Maintenance (O&M) Procedure, entitled "OM156_GL Pre-Startup Safety Reviews" (OM156_GL), to address completion of procedural items affecting facility safety before startup. However, the procedure did not define "startup." REX personnel stated during the inspection that startup occurred upon "delivery or receipt" of gas to a third party (e.g., commercial delivery). However, PHMSA found during its review that gas had been introduced into the lateral approximately 8 months prior to commercial delivery.

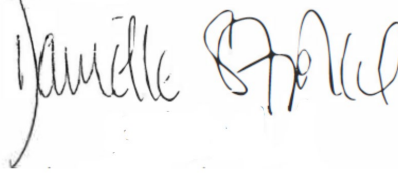
PHMSA verified from a review of REX's startup checklist, "O&M Form OM100-14 GL-Pre-Startup Safety Review Checklist" (Form OM100-14 GL), that the safety items on the checklist were not verified before gas was transported into the pipeline, but rather months afterward. Consequently, REX's failure to adequately define "startup" in its O&M Procedure resulted in a failure to ensure safety checks were documented prior to operation.

REX must revise its procedures to clearly define "startup," to ensure that all necessary procedures and programs required for safety under Part 192 are prepared and followed as soon as gas is introduced into the regulated facility.

Tallgrass Response: Updates have been made to O&M Procedure OM156_GLC – Pre-Safety Start Up and is provided as an attachment to this response.

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,

A handwritten signature in black ink, appearing to read "Danielle Stephens".

Danielle Stephens
Director, PHMSA Compliance

Tallgrass Energy
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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 Procedure OM156_GLC – Pre-Safety Start Up