



September 16, 2024

Mr. Gregory Ochs  
Director – Central Region  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
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[Via Email]

RE: CPF 3-2024-054 NOPV-PCO - ECGS

Director Ochs,

The Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) issued a Notice of Probable Violation (NOPV) and proposed compliance order (PCO) to Tallgrass, LP (Tallgrass or Company) on August 23, 2024. The NOPV was issued following PHMSA's inspection of East Cheyenne Gas Storage, LLC (ECGS), in Logan County, Colorado. ECGS is a subsidiary of Tallgrass Energy, LP.

As a result if the inspection PHMSA alleged that ECGS committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The probable violations and Company responses are provided below:

**1. § 192.481 Atmospheric Corrosion Control: Monitoring**

**(a) ....**

**(b) During inspections the operator must give particular attention to pipe at soil-air-interfaces, under thermal insulation, under disbanded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.**

ECGS failed to inspect above ground pipe for atmospheric corrosion, per the requirements of § 192.481(b). During the on-site inspection, PHMSA found that the East Cheyenne compressor stations above ground pipe was covered in thermal insulation preventing inspection of the pipe's atmospheric corrosion condition beneath it. The thermal insulation also prevented inspection of the condition of pipe supports. PHMSA found that the insulation did not have observation ports, and ECGS had not removed the insulation or inspected the pipe surface for corrosion. ECGS failed to give particular attention to the areas covered by insulation and is, therefore, in violation of § 192.481(b).

**Tallgrass Response:** Tallgrass does not contest this allegation. and will comply with the requirements of the PCO. Per discussions during the inspection, Tallgrass initiated an inspection port installation and atmospheric inspection plan in July 2023 (prior to the PHMSA inspection) which is still in progress.

**2. § 192.745 Valve maintenance: Transmission Lines**

**(a) Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.**

ECGS failed to inspect and partially operate each transmission line valve that might be required during an emergency at the proper frequency at the appropriate inspection interval, per the requirements of § 192.745(a). Specifically, PHMSA reviewed records of valve inspections which

showed four emergency valves were not inspected or partially operated in the 2022 calendar year. On Feb 21, 2023, upon learning the valves were jurisdictional, ECGS serviced and operated the four emergency valves SDV-1601 through 1604. Thus, no further action is required.

**Tallgrass Response:** Tallgrass completed inspections on the four valves on February 21, 2023. To ensure ongoing compliance, personnel have been reminded of the inspection requirements, and these tasks have been added to the inspection calendar for future scheduled maintenance.

Tallgrass Energy remains 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