



November 8, 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 3-2024-073-NOA – PXP-PRG-TMID

Director Ochs,

The Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) issued a Notice of Amendment (NOA) on October 22, 2024 to Tallgrass Pony Express Pipeline, LLC, Tallgrass Powder River Gateway, LLC, and Tallgrass Midstream, LLC (collectively Tallgrass) after inspecting procedures for operation and maintenance, corrosion control, and integrity management in Denver, Colorado from August 7, 2023, to September 1, 2023.

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

1. ***§ 195.402 Procedural manual for operations, maintenance, and emergencies.***
(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

Tallgrass' operations and maintenance (O&M) procedure "OM000_GL" was inadequate to ensure that Tallgrass' procedures were evaluated to determine the effectiveness of procedures used in normal operations, per the requirements of § 195.402(a). Tallgrass' "OM000_GL," section 3, detailed Tallgrass' process for reviewing the work done by Tallgrass to determine the effectiveness of the procedures used in normal operation. "OM000_GL" failed to include that all procedures must be reviewed and did not describe how the progress of the reviews will be tracked, as required by § 195.402(c)(13). The procedure must be amended to include a tracking mechanism that ensure each procedure in the O&M is reviewed for effectiveness.

Tallgrass Response: Updates have been made to O&M Procedure OM003_GL – Procedure Review and is provided as an attachment to this response.

2. ***§ 195.402 Procedural manual for operations, maintenance, and emergencies.***
(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be

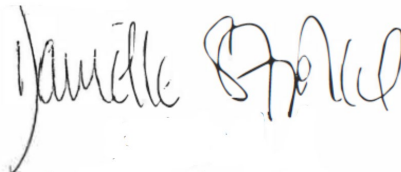
prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

Tallgrass' O&M procedure "OM301_L" was inadequate to ensure that valves were inspected and tested properly. Tallgrass' "OM301_L," "Inspecting and Servicing Emergency Valves," failed to identify which valve items shall be inspected and/or tested to determine the valve was functioning properly, as required by § 195.420(b)3 and detailed in PHMSA's OM Enforcement Guidance. The procedure must be amended to require that emergency valves be inspected and tested in all manners in which the valve could be operated during an emergency.

Tallgrass Response: Updates have been made to the referenced O&M Procedure OM301_L - Inspecting and Servicing Pipeline Valves 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,



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 Procedure OM003_GL – Procedure Review
- O&M Procedure OM301_L – Inspecting and Servicing Pipeline Valves