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July 25, 2025

David Barrett
Acting Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

CPF 3-2025-007-NOPV

Dear Mr. Barrett:

In response to your notice issued June 25, 2025, DT Midstream, the owner/operator of Viking Gas Transmission Co. (Viking), has elected to provide the following response. As you may be aware, DT Midstream became the owner/operator of Viking as of Dec. 31, 2024. All allegations discussed below are related to the previous owner. While DT Midstream is responding to these allegations, it is also contesting the Proposed Civil Penalty as it was not the owner/operator at the time of the subject inspection. Furthermore, DT Midstream is proposing to address any proposed Compliance Order items using its Transmission Integrity Management Program, into which the Viking system is currently being integrated. This integration is expected to be completed on or about Dec. 31, 2025.

Comments regarding the Alleged Violations

Allegation #1: Viking failed to notify PHMSA of construction incurring \$10 million or more in accordance with 191.22(c)(1)(i).

Response: Based upon a review of the projects involved, the dates of their commencement and the date of notification, Viking is not contesting PHMSA's findings.

Allegation #2: Viking failed to follow their procedures regarding the handling of an anomaly whose evaluation indicates a possible Safe Operating Pressure less than the Maximum Allowable Operating Pressure.

DT Midstream
500 Woodward Ave.
Suite 2900
Detroit, MI 48226

Response: After a review the assessment results on the pipeline segment Frazee 2210 to Cushing 2213, Viking is not contesting PHMSA's findings.

Allegation #3: Viking failed to follow their procedures regarding the application of a Corrosion Growth Rate to the results of ILI runs conducted in 2017, 2019 and 2022.

Response: After a review the inspection results, Viking is not contesting PHMSA's findings.

Allegation #4: Viking failed to follow their procedures regarding the documentation of their anomaly analysis and decision-making process regarding investigation of these anomalies.

Response: After a review the inspection results, Viking is not contesting PHMSA's findings.

Allegation #5: Viking failed to follow their procedures regarding the use of ILI data integration (method 2) for the 2020, 2021 & 2022 risk models.

Response: After a review the inspection results, Viking is not contesting PHMSA's findings.

Allegation #6: Viking failed to develop procedures regarding the identification of threats, conducting risk assessments and evaluating the merits of any preventive and mitigative measures for its natural gas facilities.

Response: After a review the inspection results, Viking is not contesting PHMSA's findings.

Allegation #7: Viking failed to implement additional preventive and mitigative measures beyond those already required by Code.

Response: After a review the inspection results, is not contesting PHMSA's findings.

Comments regarding the Proposed Civil Penalty

A civil penalty of \$53,900 has been proposed for Item (Allegation) #5, failure to follow procedures regarding the use of ILI data during risk modeling that took place in 2020, 2021 & 2022. Viking had a change of ownership and operations on December 31, 2024. In this situation, the new owners are being held accountable for actions that they had no possible way of influencing or controlling. Accordingly, DT Midstream respectfully requests that this proposed civil penalty be rescinded.

Comments regarding the Proposed Compliance Order

A. Procedure Amendment to Prohibit the use of Unverified Zero-Percent Growth Rate – The proposed order requests a change to the written program that was in effect at the time of the inspection. That program was under the control and ownership of the former owners of Viking.

As such, Viking's current owner (DT Midstream) cannot make the requested change. Viking proposes to provide proof that this prohibition is present in the DT Midstream Transmission Integrity Management Program that Viking is currently being integrated into. Requested time frame – 180 days after Final Order.

B. Actions to Address Viking's Failure to document Anomaly Investigation Decisions

1. Viking proposes to conduct a run comparison on the Milaca to Osceola segment runs performed in 2017 and 2024. This comparison will take longer than 90 days after the Final Order as these tool runs were run under another company's specifications and scope of work. Viking will need to source outside resources to adequately compare these runs. Requested time frame - 270 days after Final Order to complete this submittal.
2. Viking proposes to reevaluate each anomaly listed in the table under item #4 for the 2022 Ada to Frazee run and 2019 Frazee to Cushing run in accordance with the DT Midstream Transmission Integrity Management Plan and submit the findings to the Director. Requested time frame - 270 days after Final Order to complete this submittal.

C. Develop & Submit Procedures to Adhere to the Requirements of 192.911 regarding

Facilities – Viking will submit written procedures to provide proof of meeting this requirement in the DT Midstream Transmission Integrity Management Plan. Requested time frame – 180 days after Final Order.

D. Follow-up Reporting - If any of these items were to extend beyond their requested time frame, Viking will report on their due date to the Director on all outstanding Compliance Order items. This reporting will continue every 90 days until all items are completed and the Final Order is closed.

E. Cost Reporting – Viking has no issue on this item and accepts as written in the Proposed Compliance Order.

Viking believes these changes will address PHMSA's alleged safety concerns. Viking, as well as all DT Midstream, remains committed to the safe operation of its pipelines. Please feel free to contact me if you have any questions.

DT Midstream
500 Woodward Ave.
Suite 2900
Detroit, MI 48226

Sincerely,

Signed by:

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Mr. David Slater
President & CEO, Viking Gas Transmission Co.

Cc: Christopher Zona, Chief Operating Officer
Philip Coleman, DTM Director of Codes & Regulatory
Patrick Raichel, DTM Manager of Codes & Compliance

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