



January 15, 2025

Mr. Gregory Alan Ochs, Director
Central Region, Office of Pipeline Safety
U.S Department of Transportation
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: Lambda Energy Gathering LLC [OPID #: 40028] Response to Notice of Amendment –
CPF 3-2025-010-NOA

Mr. Ochs:

Lambda Energy Gathering LLC (Lambda), is in receipt of your Notice of Amendment, dated January 14, 2025. The following inadequacies were identified:

1. Lambda's Control Room Management Program, (version 1.0, effective April 18, 2022) (CRM Plan), section C, subsection 8.4, was not adequate to describe Lambda's process to test its backup SCADA system and document the test to demonstrate compliance with § 195.446(c)(4).
2. Lambda's CRM Plan, section E, subsection 3.3, was not adequate to describe the current practice in place for identifying and correcting inaccurate or malfunctioning alarms, per the requirements of § 195.446(e)(1).
3. Lambda's CRM Plan, section E, subsection 3.3, was not adequate to provide a process to verify the correct safety-related alarm set-point values and alarm descriptions when associated field instruments are calibrated or changed and at least once each calendar year, but at intervals not to exceed 15 months, per the requirements of § 195.446(e)(3).
4. Lambda's CRM Plan, section E, subsection 3.3, "Safety Reviews," was not adequate to provide a process that demonstrated compliance to monitor the content and volume of general activity being directed to and required of each controller that will assure controllers have sufficient time to analyze and react to incoming alarms, per the requirements of § 195.446(e)(4).
5. Lambda's CRM Plan was not adequate to demonstrate compliance with § 195.446(f)(1). CRM Plan, section F, subsection 3.1 The CRM Plan lacked a mechanism to notify the control room of changes, so the control room representative could review the changes, provide appropriate feedback, represent the control room's perspective and needs, initiate internal control room management of changes (MOC), update procedures, and training.
6. Lambda's field Standard Operating Procedures (SOP) were not adequate to demonstrate compliance with § 195.446(f)(2), which requires field personnel to contact the control



room when emergency conditions exist and when making field changes that affect control room operations, and § 195.402(c)(15) which requires the implementation of the applicable control room management procedures required by § 195.446.

7. Lambda's CRM Plan, section D, subsection 6.4, was not adequate to describe its practice for reviewing accidents that must be reported pursuant to §§ 195.50 and 195.52 to determine if control room actions contributed to the event and, if so, correct, where necessary, deficiencies related to controller fatigue, per the requirements of § 195.446(g)(1)(i).
8. CRM Plan, section H, subsection 5.8, "Team Training," was not adequate to demonstrate compliance with § 195.446(h)(6).

As referenced in your Notice of Amendment, CPF 3-2025-010-NOA, the above inadequacies will be addressed and rectified with submittal to PHMSA for review within the prescribed time period allotted. Pursuant to guidance provided by PHMSA in the document titled "Response Options for Pipeline Operators & Excavators in Enforcement Proceedings", section II, a., Lambda is not contesting the Notice of Amendment and will incorporate recommended changes into our Control Room Management (CRM) Plan and Operations Manual.

Lambda greatly appreciates the guidance and learning aspects provided through this inspection for enhancement of our written Control Room Management (CRM) plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Harry Faulkner", with a stylized flourish at the end.

Harry Faulkner, President/CEO
Lambda Energy Gathering LLC