



CountryMark Innovation Center
401 Southwind Plaza
Mt. Vernon, IN 47620
www.countrymark.com

July 25, 2025

Mr. David A. Barrett
Acting Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

Re: Countrymark Refining and Logistics, LLC
Response to Notice of Amendment
CPF-3-2025-017-NOA

Dear Mr. Barrett:

Countrymark Refining and Logistics, LLC (CM) has received the referenced Notice of Amendment (NOA) issued by the Pipeline and Hazardous Safety Administration (PHMSA) dated July 2, 2025.

Contained herein is CM's response to each of the items listed in the NOA consistent with the response options outlined in the accompanying "Response Options for Pipeline Operators and Excavators in Enforcement Proceedings." CM does not contest five of the six items listed in the NOA, specifically items 1,2,3,4, and 6.

CM has made amendments to its procedures as described in the NOA to achieve compliance and has included those amendments as attachments to this response.

With specific regard to NOA item #5, CM respectfully contests inclusion of this item in the NOA and inclusion in the Final Order for the reasons outlined further below.

NOA Item #1 - § 195.402 Procedural manual for operations, maintenance, and emergencies

CM is not contesting the Notice and has amended the following procedures to correct the inadequacies:

- Amended Section 3.5.2 of the Control Room Management Plan (Attachment 1-A)
 - Bullet #4 added “until all conditions have returned to normal”
 - Added “If the abnormal condition is found in the field, the field personnel must first contact the Pipeline Controller”
 - Added “All abnormal conditions found by Pipeline Controllers or reported to Pipeline Controllers by Field Personnel will be logged by the Pipeline Controller using POEMS CRM Software Suite;”
 - Amended #6 to state: “Document the AOC using POEMS CRM Software Suite and communicate condition during shift hand-over. Any documents created for the AOC from the field will be added to the AOC document on POEMS CRM Software Suite. This AOC document will be reviewed by the Pipeline Control Center Supervisor on POEMS.
- Amended Section 8 of O&M procedure P-195.402d: Abnormal Operations (Attachment 1-B)
 - Added field personnel must first notify the control room
 - Added communication options for restarting a pipeline following an abnormal operation
 - Added circumstances for approving the restart of a pipeline following an abnormal operation

NOA Item #2 - § 195.446 Control room management

CM is not contesting the Notice and has amended the following procedures to correct the inadequacies:

- Amended Section 3.2 of the Control Room Management Plan (Attachment 2-A)
 - Added “This authorization to restart will be documented on the AOC form on POEMS CRM Software Suite. The decision to restart will be made by these individuals by verifying information with the appropriate onsite and control room personnel or source (SCADA) prior to restarting the line.”
- Amended Section 2.3 of the Emergency Response Plan (Attachment 2-B)
 - Updated to state field personnel must first contact the control room
- Amended Section 4.11 of the Emergency Response Plan (Attachment 2-C)
 - Included the requirements and conditions to restart a pipeline following an emergency
- NOTE: Procedure P-195.402e that is referenced in the NOA no longer exists. The requirements for 49 CFR 195.402(e) have been included in CM’s Emergency Response Plan (Sequence Number 0809)

NOA Item #3 - § 195.446 Control room management

CM is not contesting the Notice and has amended the following procedures to correct the inadequacies:

- Amended Section 4.4 of the Control Room Management Plan (Attachment 3-A)
 - Changed “repaired” to “replaced”
 - Changed “modified” to “added”
 - Included definitions and examples of “added” or “expanded” SCADA systems

NOA Item #4 - § 195.446 Control room management

CM is not contesting the Notice and has amended the following procedures to correct the inadequacies:

- Amended Section 5.8 of the Control Room Management Plan (Attachment 4-A)
 - Added “Circadian: Working Nights Newsletter (monthly issue)” to the fatigue training
- Amended Section 5.9 of the Control Room Management Plan (Attachment 4-B)
 - Added test scoring from Veriforce-Fatigue Awareness Training for Pipeline Control Room Personnel
- Updated Form F-195.446(j) Annual Fatigue Management Training (Attachment 4-C)

NOA Item #6 - § 195.446 Control room management

CM is not contesting the Notice and has amended the following procedures to correct the inadequacies:

- Amended Section 6.6 of the Control Room Management Plan (Attachment 6-A)
 - Added “and the setpoint determination process is outlined in Appendix C: Process for Determination of Alarm Setpoint in the Alarm Management Plan for Archestra CountryMark. Any deficiencies found in the review shall be addressed and documented on form F-195.446(i).”

NOA Item #5 - § 195.446 Control room management

CM is respectfully contesting the findings in item #5. The items are centered around CM’s work order management system. There are no requirements identified in 49 CFR 195 regarding an operator’s management system.

- Regarding work order requests, the NOA specifically notes that “Exceeding priority time limits would be considered a deficiency of CountryMark’s ALM Plan required by § 195.446(e)(6).” Work requests in CM’s work order management system do not have time limits or time

requirements. The referenced days are strictly used as guidance for the requestor to determine which priority to use. CM completes work requests based on the safety and/or operational priority of the task. Utilizing a time limit or requirement approach would not be in line with CM's goal of pipeline safety and could have an adverse effect on pipeline safety. Therefore, CM does not feel that this process violates any requirement in 49 CFR § 195.446.

- Regarding procedures and training on workorder requests, the NOA specifically notes that "This process was not described or detailed in any process or training content." Procedures and training for work request do exist and the controllers are proficient in their use, but it was not embedded into the Control Room Management Plan nor the Alarm Management Plan. CM feels that adding workorder management procedures directly into the plans is not a requirement in 49 CFR § 195.446, would be overly burdensome, and would not provide any additional safety value. Therefore, CM does not feel that this process violates any requirement in 49 CFR § 195.446.
 - CM did update Section 3.5.2 of the Control Room Management Plan to include a link to the work order management system procedures in lieu of embedding the entire management system procedure into the plan

Summary

Countrymark Refining and Logistics, LLC shares PHMSA's commitment to pipeline safety and appreciates the opportunity to respond and proactively resolve these issues. The amended procedures addressing items 1,2,3,4, and 6 are included as part of this response. Countrymark Refining and Logistics, LLC preserves its right to contest the findings in item 5, though. If you have any questions or need additional information, please contact me by phone at (812-483-3848) or email at blair.currie@countrymark.com to discuss.

Sincerely,

Blair Currie
Manager of Pipeline Integrity

Attachments

NOA Item #1

- Attachment 1-A: CRM Plan - Section 3.5.2



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- Attachment 1-B: O&M procedure P-195.402d: Abnormal Operations - Section 8

NOA Item #2

- Attachment 2-A: Control Room Management Plan – Section 3.2
- Attachment 2-B: Emergency Response Plan - Section 2.3
- Attachment 2-C: Emergency Response Plan - Section 4.11

NOA Item #3

- Attachment 3-A: Control Room Management Plan – Section 4.4

NOA Item #4

- Attachment 4-A: Control Room Management Plan – Section 5.8
- Attachment 4-B: Control Room Management Plan – Section 5.9
- Attachment 4-C: Control Room Management Plan – Form F-195.446(j) Annual Fatigue Management Training

NOA Item #6

- Attachment 6-A: Control Room Management Plan – Section 6.6