



Notice of Amendment – Response

June 19, 2026

Amy Jo McKean
Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

CPF 3-2026-009-NOA

Dear Ms. McKean:

Bridger Pipeline LLC is in receipt of the NOA issued May 20, 2026 subsequent to a PHMSA inspection conducted in July 2025 at the Bridger Control Room in Casper WY.

As a result of the inspection, PHMSA sites seven areas for amendment in the Bridger CRM plan. Bridger intends to make amendments in each of those seven areas and is currently working on those updates. Some of the practices have already been updated and we are working on making the amendments necessary to reflect those updated practices in the plan itself.

While we intend to submit amendments addressing each of the seven areas, we believe that PHMSA is errant in its application of the regulations under item number 2 with respect to idled pipelines. We have repeated that item below and offer our response to that finding below.

2. § 195.446 Control Room Management.

(a) General. *This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. . . .*

(b)

(c) Provide adequate information. *Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:*

(1)

(3) Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months;

Bridger's Control Room Management (CRM) procedures did not adequately implement the requirements of internal communication plan testing and verification under § 195.446(c)(3). The CRM procedures in section 3.5, Internal Communication Plan (ICP), stated, "If adequate resources ARE NOT available, steps will be taken to shut down the affected pipeline asset following safe shut down practices. Once a shutdown has been complete, the field personnel performing the shutdown shall communicate to the Control Room the task is complete." When a pipeline is shutdown and not purged, the pipeline is still in operation.



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*The internal communication plan for manual operations does not adequately describe what will be done to continue safe manual operations for the pipeline when it is shut down and not purged.
The CRM procedures or other referenced procedures must be amended to adequately describe what will be done to continue safe manual operations of the pipeline*

As noted above, Bridger intends to address the concerns in our updated plan language. However, in the citation above, PHMSA fails to consider the reduced risk of a pipeline that has been isolated and is no longer being used in the transportation of liquids. PHMSA recognizes “active” or “abandoned” pipelines and pipeline facilities that are equipped to “failsafe” (see 49 CFR 195.402(c)(8)); however, it fails to consider “idled” pipelines. The plain language of 49 CFR 195.402(c)(8) recognizes the value of a pipeline that is designed to fail safe and the decreased need for “monitoring from an attended location pipeline pressure during startup until steady state pressure and flow conditions are reached and during shut-in to assure operation within limits”. PHMSA does not define fail safe, so we are required to use the plain meaning of the term which is “incorporating some feature for automatically counteracting the effect of an anticipated possible source of failure”. While a pipeline that has been “shut-in” using a company’s internal communications plan for manual operations was not “designed to fail safe”, once it has been “shut-in” it has reached a similar state to those which do fail safe, and as such, would be subject to similar expectations with regard to “monitoring from an attended location”. Bridger intends to improve its plan language to better reflect ongoing monitoring of a line that has been shut down and isolated, but PHMSA should address this seeming disconnect between the manual operations language found in 49 CFR 195.446(c)(3) and that found in 49 CFR 195.402(c)(8) regarding a line that is “shut-in” and revise, as necessary, the finding noted above.

Bridger respectfully requests 90 days to submit revised plans for PHMSA review.

Sincerely,

Ken Dockweiler

Ken Dockweiler
Director – Regulatory Compliance and Control Room
Bridger Pipeline LLC



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