U.S. Department of Transportation
Pipeline and Hazardous
Materials Safety Administration

1100 Main Street, Suite 800
Kansas City, MO 64105
(816) 329-3800

WARNING LETTER

VIA ELECTRONIC MAIL TO: tad.true@truecos.com; Ken.Dockweiler@truecos.com; kevin.pena@truecos.com

May 20, 2026

Tad True
Chief Operating Officer
Bridger Pipeline, LLC
455 North Poplar Street
Casper, WY 82602

CPF 3-2026-012-WL

Dear Mr. True:

From July 7, 2025 through July 25, 2025, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.), conducted an inspection of the control room of the Bridger Pipeline, LLC ("Bridger") in Casper, Wyoming.

As a result of the control room inspection, it is alleged that Bridger has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

1. § 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) *Roles and responsibilities*. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:**
>
> **(1) A controller's authority and responsibility to make decisions and take actions during normal operations;**

(2) A controller's role when an abnormal operating condition is detected, even if the controller is not the first to detect the condition, including the controller's responsibility to take specific actions and to communicate with others;

Bridger failed to define the roles and responsibilities of a controller during normal and abnormal operating conditions as required by §§ 195.446(b)(1) and 195.446(b)(2). Specifically, by not providing the controller with the maximum operating pressure (MOP) of the Alexander Fairview pipeline segment that was purchased by Bridger on May 7, 2024, Bridger failed to define a controller's authority and responsibility to make decisions and take actions during normal and abnormal operating conditions.

The Control Room Management Plan (CRM Plan), Revised June 2025, Section 2.3, Normal Operating Conditions – Controllers, stated the controller must "Control the pipeline and ensure all segments of the pipeline are maintained below the MOP. The MOP for the pipeline segments is readily available to the Controller." In addition, the CRM Plan, Section 2.4, Abnormal Operating Conditions – Controllers, stated, “The role of a Controller during abnormal operating conditions is to determine the current status of the pipeline system(s), to assist in discovering the cause of the abnormal condition and to operate the pipeline system(s) safely while making sure that MOP limits are not exceeded.”

However, the Protective and Control Device Diagram for the Alexander Terminal failed to show the MOP and was marked only as "preliminary." There was no MOP listed for the Alexander Fairview segment in the P&CD book, which was stated to be the resource controllers utilized. The CRM Plan failed to identify the MOP for each pipeline segment. By failing to define the MOP, the CRM Plan did not provide sufficient information for Bridger’s controllers to execute their roles and responsibilities during normal and abnormal operations and hindered the controllers’ prompt and appropriate response to operating conditions. In this way, Bridger failed to sufficiently define controller roles and responsibilities.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed $272,926 per violation per day the violation persists, up to a maximum of $2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024 the maximum penalty may not exceed $266,015 per violation per day the violation persists, up to a maximum of $2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023 the maximum penalty may not exceed $257,664 per violation per day the violation persists, up to a maximum of $2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023 the maximum penalty may not exceed $239,142 per violation per day the violation persists, up to a maximum of $2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022 the maximum penalty may not exceed $225,134 per violation per day the violation persists, up to a maximum of $2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021 the maximum penalty may not exceed $222,504 per violation per day the violation persists, up to a maximum of $2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021 the maximum penalty may not exceed $218,647 per violation per day the violation persists, up to a maximum of $2,186,465 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in Bridger Pipeline, LLC being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 3-2026-012-WL.** Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Sincerely,

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

cc: Ken Dockweiler, Director Government and Control Center, ken.dockweiler@truecos.com
Kevin Pena, Pipeline Compliance Coordinator, kevin.pena@truecos.com