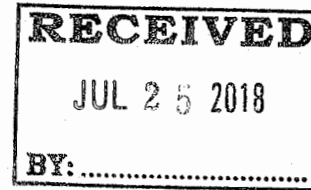


July 23, 2018

Mary L. McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074



Reference: **CPF 4-2018-1008M**

Dear Ms McDaniel,

I have received the July 3, 2018, Notice of Amendment from the above reference inspection of the Targa Resources Operating LLC (Targa) Offshore Pelican/Seahawk Gas System in the OCS-Gulf of Mexico.

We are submitting the following response along with the enclosed copies of revised procedures in accordance with the Notice of Amendment.

1. §192.605 Procedural manual for operations, maintenance, and emergencies.

(b) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations

(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.

Targa's Corrosion Control Procedure does not meet §192.605(c) in that there is no reference to the form designated as the "Offshore Corrosion Inspection Report". Targa employees have been using this form for the past four (4) years to conduct and document Atmospheric Corrosion Control Inspections. However, no reference to this form can be found in the procedures. This form is not included on the page that list forms within the Targa Corrosion Control Procedures. According to the operator, the procedure does not have to have a specific form to conduct the Atmospheric Corrosion Control Inspection, the inspection just has to be documented. If the form is not used then how does Targa ensure that personnel are following procedures, trained properly and capturing all information that is required by the corrosion procedure.

Targa must revise the Corrosion Control procedure to include the form "Offshore Corrosion Inspection Report" as part of those procedures.

Response: *Targa has revised the procedure entitled Atmospheric Corrosion Control Monitoring to require the completion of the Atmospheric Corrosion Survey form and have included the form in the form section of the Operations, Maintenance, and Emergency Manual. Refer to the enclosed copies of the procedure and form.*

2. **§192.615 Emergency plans**

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedure must provide the following

(1) Receiving, identifying, and classifying notices of events which require immediate response by the operator

Targa's Emergency response procedures does not include instructions for individuals who normally receive calls for the operator, who identifies the situation, directs callers to seek safety first, and then gathers critical information to promptly initiate the operator's response efforts. The Targa Midstream Services LLC, Gulf of Mexico; Regional Oil Spill Response Plan is incorporated in the Emergency Plan and some of the procedures that are outlined in the Regional Oil Spill Response Plan are referenced and used to comply with §192.615. During a discussion with Targa personnel, it was noted that the initial call from the person notifying Targa is not documented by the Targa employee receiving the call. The procedure needs to be revised so that the Targa employee documents that initial notification. This record would indicate when Targa was first notified of any leaks, incidents or emergencies and what initial emergency response was performed.

Targa must revise its procedures to include that the initial notification of leaks, incidents or emergencies are documented by Targa employees.

Response: *Targa has revised the procedure entitled RECEIPT, IDENTIFICATION, CLASSIFICATION OF EMERGENCY PROCEDURES from Targa's emergency plan to include requirements and instructions for Targa personnel to inform callers to seek safety first. The procedure lists the information Targa personnel who receive the call are to document. The information required includes time and date of initial notification of leaks, incidents or emergencies. Refer to the copy of the enclosed procedure.*

3. **§192.612 Underwater inspection and reburial of pipelines in the Gulf of Mexico**

(a) Each operator shall prepare and follow a procedure to identify its pipelines in the Gulf of Mexico and its inlets in waters less than 15 feet (4.6 meters) deep as measured from mean low water that are at risk of being an exposed underwater pipeline or a hazard to navigation. The procedures must be in effect August 10, 2005.

Targa's Periodic Underwater Inspection Procedures (rev. 9/24/2013) does not comply with the recordkeeping requirements of §192.709(c). Page 8 of 17 of the procedure is designated as Record Retention. This section states the inspection will be "kept for at least two years, or until the next inspection or test is performed, whichever is longer. The requirements of §192.709(c) states that records of each patrols, surveys, inspections ... must be retained for at least five (5) years.

Targa must revise the Periodic Underwater Inspection Procedure to state that the record of the survey will be retained for five (5) years as required by §192.709(c)

Response: *Targa has revised the Targa's Periodic Underwater Inspection procedure to require the record of the survey be retained for five (5) years or until the next survey is completed whichever is longer. Refer to enclosed copy of page 8 of the procedure listing Record Retention.*

4. **§192.805 Qualification program**

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(b) Ensure through evaluation that individuals performing covered tasks are qualified;

Targa's Operator Qualification program does not comply with the recordkeeping requirements of §192.807 (b). During the inspection, PHMSA reviewed the covered task qualification Evaluation Method for Valve Maintenance (OQ – M-08-LC). It was noted that the following statement was listed on the evaluation form: "Records will be kept or a minimum of two years or until the new inspection is performed, whichever is greater."

The Targa Qualification Evaluation Method for Valve Maintenance needs to be revised to reflect the correct retention time period of five (5) years as required by §192.807 (b).

Response: *The form referenced above was used by Targa to record qualification of personnel to perform the valve maintenance task, and the form listed the required retention time of the record for valve maintenance. We have replaced that form with the enclosed form "Task 0341 Valve – Preventative Maintenance" to record the qualification of personnel to perform the task. This form does not reference the inspection record retention time as was referenced in the previous form. Since personnel completing qualified tasks are not responsible for maintaining the records of those tasks, the record retention time is not listed on the qualification records. Records retention is addressed in Section 8 of the OQ plan and states that records will be maintained for 5 years.*

Should there be any questions regarding these responses or should you need additional information, please contact me at (713) 584-1138 or by email at

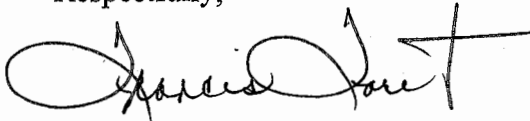
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Ms. Mary L. McDaniel, P.E

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fforet@targaresources.com. Alternative, feel free to contact Gregg Johnson, Targa's
Director, Pipeline Compliance at (713) 584-1362 or by email at
gjohnson@targaresources.com.

Respectfully,

A handwritten signature in black ink, appearing to read "Francis Foret". The signature is stylized with a large, looped "F" and a long horizontal stroke at the end.

Francis Foret
Senior Vice President – Operations

Enclosures

CC: Gregg Johnson
Julie Pabon