

Via - EMAIL

November 5, 2021

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
Southwestern Region Office
8701 S. Gessner, Suite 630
Houston, TX 77074

RE: CPF 4-2021-057-NOPV– Response to Notice of Probable Violation and Compliance Order

Ms. McDaniel,

On November 1, 2021, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Proposed Violation (NOPV) and Proposed Compliance Order (PCO), CPF 4-2021-057-NOPV to Midship Pipeline Company, LLC (Midship). This letter constitutes Midship's formal response to the NOPV. Midship does not contest the NOPV and agrees to address the matters outlined in the PCO.

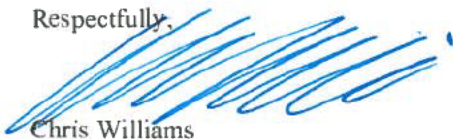
With respect to Item 1 in the NOPV and PCO, Midship has confirmed that adequate Cathodic Protection monitoring is maintained by the test lead at station number 9927+59, which is 39 feet from the test lead at station 9927+20. Midship has attached documentation reflecting the abandonment of the test lead at station 9927+20. See Item 1 in the attached Appendix.

With respect to Item 2 in the NOPV and the PCO, Midship has amended O&M Procedure OMP-PPL-6072 "*Handling Abnormal Operating Conditions*", Section 2.1, line 4 to reflect the changes requested by PHMSA in the PCO. Midship has also amended Form F-6072 to include a Performance Assessment Summary section to capture the response of the operator and measure the effectiveness of the procedure. The updated procedure and record change is in Item 2 in the attached Appendix.

In summary, the proposed change for Item 1 has been implemented and documented and with respect to Item 2, the proposed procedure amendment has been incorporated into the manual and will be communicated and reviewed with personnel prior to implementation using our established manual review process.

Midship takes our commitment to pipeline safety very seriously and is dedicated to the safety and wellbeing of the communities in the areas where we operate. If you have any questions, or should require additional information, please do not hesitate to contact Paul Falgout at (713) 375-5855.

Respectfully,



Chris Williams
Vice President, Pipeline Operations

Attachment:
See Appendix