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January 19, 2022

Mary L. McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
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Ref: CPF 4-2021-074-NOA

Dear Ms. McDaniel:

DCP Midstream, L.P. ("DCP") is in receipt of a Notice of Amendment (CPF 4-2021-074-NOA, or the "NOA") issued by the Pipeline and Hazardous Materials Safety Administration ("PHMSA") dated December 20, 2021, arising from a February 22, 2021 to October 1, 2021 inspection of DCP's Liquid Pipeline Operations and Maintenance Manual (the "Liquid Manual") as applied to the Marysville Storage Field and Wattenberg NGL pipeline system.

Based on the inspection, PHMSA has identified certain inadequacies found within DCP's Liquid Manual, under 49 CFR Sections 195.402(c), 195.583(b) and 195.440.

As described below, DCP acknowledges the findings set forth in the above-referenced NOA and has amended the corresponding procedures in the Liquid Manual. Please see the attached copies of the amended procedures.

Item 1. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) . . .

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1) . . .

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

§ 195.583 What must I do to monitor atmospheric corrosion control?

(a) . . .

(b) During inspections you must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

DCP's written procedure for conducting atmospheric corrosion inspections is inadequate because it does not include an inspection frequency for conducting atmospheric corrosion inspections for pipe at pipe supports. DCP's *Standard Operating Procedure (SOP), Procedure Number: CORR-5020, Atmospheric Pipe Inspection dated 3/18/2021*, "Section 1.1.7 Concealed areas under tie down straps or supports", states, "If there is no visual evidence of corrosion, no further action is required." The procedure, as written, does not comply with the requirements in § 195.583(b), because it allows DCP the option to never conduct atmospheric corrosion inspections of pipe at pipe supports. DCP must amend its procedures for conducting atmospheric corrosion inspections to include a required inspection frequency regardless of visual evidence of corrosion for pipe at pipe supports in accordance with § 195.583(b).

DCP's response:

DCP acknowledges that the cited language in Section 1.1.7.2 of DCP's Standard Operating Procedure (SOP), Procedure Number: CORR-5020, Atmospheric Pipe Inspection, was confusing. DCP did not intend to communicate that further inspections were not required when no visual evidence of corrosion was observed. The first page of CORR-5020 provides the correct frequency of inspections for all Onshore Pipelines, including pipe supports or other (every three years, not to exceed 39 months) and Offshore Pipelines (once per calendar year, not to exceed 15 months). Therefore, DCP has revised CORR-5020 to clarify this issue by deleting Section 1.1.7.2 and revising Section 1.1.7.1 to add more detailed guidance on conducting an inspection of concealed areas under tie-down straps or supports. The procedure has also been revised by adding several examples of staining pictures that would necessitate further inspection as directed in the decision tree. **Please see Exhibit-1:**

Item 2. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) . . .

(d) Abnormal operation. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded: (1) Responding to, investigating, and correcting the cause of:

(i) . . .

(v) Any other malfunction of a component, deviation from normal operation, or personnel error which could cause a hazard to persons or property.

DCP's response:

DCP's written procedure regarding abnormal operating conditions is inadequate because it does not include procedures that provide safety when responding to, investigating, and correcting the cause of any malfunction of a component. Specifically, DCP's *Liquid Pipeline O&M Manual, Procedure Number F-06 dated 10/12/2020, Abnormal Operations*, "Section 1.7 Other Malfunction or Error", does not give clear instructions to operations personnel regarding who may perceive signs that an abnormal operating condition (AOC) has occurred, and does not give specific instructions on how to respond when these conditions are encountered to prevent an unsafe situation.

DCP has amended Section 1 of the Liquid Manual, Procedure Number F-06, Abnormal Operation Conditions, to clarify that operator-qualified personnel who are performing or supervising pipeline operations and maintenance activities will be trained to recognize and react

to AOCs. DCP has also included a new Section 2.2 which explains the responsibility of any employee for responding to any AOC.

2. The responsibility for detection and notification must rest with the first employee aware that an abnormal operating condition exists.
 - a. In the event of an abnormal operating condition involving a potential unintended release of product, the following steps should be taken:
 - i. Eliminate potential ignition sources.
 - ii. Move to a safe location.
 - iii. Notify emergency response personnel, as appropriate.
 - iv. Limit access to the location, as necessary.
 - v. Follow appropriate procedures for notification, documentation, and remedial action.

Please see Exhibit-2.

DCP has also amended its liquid pipeline O&M manual, F-19, Valve Inspection and Maintenance, dated 12-03-2021 reflecting the detection & notification of any abnormal operating condition in Section 2.5, Valve Inspection and Testing.

5. *Inspect the valve for product leakage at flanges, bonnet, stem seals, threaded connections, or packing. Signs of product leakage may include but are not limited to:*
 - a. *Formation of ice balls on pipeline valves and/or valve components in NGL service*
 - b. *Vapor clouds of unknown origin*
 - c. *Unusual sounds or odors*
 - d. *Pipeline product on the ground / in puddles*
 - e. *Dead vegetation near buried valves*
6. *If an uncontrolled release of product is identified during the valve inspection process, reference DCP Midstream Liquid O&M procedure F-14, Emergency Procedures and Training.*

Please see Exhibit-3.

Item 3. § 195.440 Public awareness.

(a) Each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, see § 195.3).

(b) . . .

(g) The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.

DCP's response:

DCP's written continuing public education program is inadequate because it does not conduct the program in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's areas. Specifically, DCP's *Public Awareness Program (Version 7.1, July 15, 2019)*, "Section V. Program Components Languages (PA 2.3.1)" states: "Material provided to Schools, Emergency Response Agencies, Public Officials and the One Call Centers is not provided in languages other than English because government proceedings and response activities are conducted in English."

DCP has revised its Public Awareness Program since the inspection and has further clarified the provisions of Section 1.5, Program Components, of Version 7.2 (August 10, 2021) to remove the language noted in the NOA, and to add the following new language:

"When a language meets 5% or more of the total population within the Buffer zone, PIR or the Safe Separation Distance (SSD) and within the county limit, then DCP will evaluate that language and modify the mailing materials reflecting that specific language other than English or Spanish. The modified materials will be made available to the Affected Public, Excavators, Schools, Emergency Response Agencies, Public Officials and the One Call Center stakeholder groups."

Please see Exhibit-4.

DCP believes that the attached revised procedures address the issues identified in the NOA and provides a basis for expedited resolution of this matter. Please feel free to contact me or John Pontious at (405) 605-3859 if there are any questions or concerns regarding DCP's amendment of its procedures and plans.

Sincerely yours,
DCP MIDSTREAM

DocuSigned by:
Alison Barry
C1CE6F36FA30454
Alison E. Barry

cc: John Pontious
Greg Tilley
Skyler Houtz
Michael Pavlak
Mohammed Mahmood
Linda Fukui

Attachments:

EXHIBIT-1
EXHIBIT-2
EXHIBIT-3
EXHIBIT-4