

June 2, 2023

Mr. Bryan Jeffery Lethcoe
Director Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston TX 77074

CPF 4-2023-043-NOA

Dear Mr. Lethcoe:

Targa has reviewed the referenced NOA and is submitting this response as outlined below.

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.

§ 195.452 Pipeline integrity management in high consequence areas. (a)

(h) *What actions must an operator take to address integrity issues?* –

(1)

(2) *Discovery of condition.* Discovery of a condition occurs when an operator has adequate information to determine that a condition presenting a potential threat to the integrity of the pipeline exists. An operator must promptly, but no later than 180 days after an assessment, obtain sufficient information about a condition to make that determination, unless the operator can demonstrate the 180-day interval is impracticable. If the operator believes that 180 days are impracticable to make a determination about a condition found during an assessment, the pipeline operator must notify PHMSA in accordance with paragraph (m) of this section and provide an expected date when adequate information will become available.

Targa's integrity management plan was inadequate to assure safe operation of a pipeline facility in accordance with § 195.402(c)(3). Specifically, Targa's Integrity Management Program for Liquids Transmission Pipeline (Rev: 4/1/2020) (IMP) failed to describe what adequate information is needed to determine that a condition presenting a potential threat to the integrity of the pipeline exists, as required by § 195.452(h)(2).

In Section 2.0 of its IMP, Targa failed to provide details on or define the adequate information required to confirm discovery of a condition. This section copies the regulatory definition, with

no additional details. The plan must provide details on circumstances which may constitute discovery of a condition.

Therefore, Targa's written integrity management plan was inadequate to assure safe operation of a pipeline facility in accordance with § 195.402(c)(3). Targa must revise its integrity management plan to describe the adequate information needed to determine discovery of a condition in accordance with § 195.452(h)(2).

Targa's response:

While Targa respectfully disagrees with PHMSA's comments stating, "*Targa failed to provide details on or define the adequate information required to confirm discovery of a condition,*" Targa understands that additional language can be added to the manual to better define discovery. To better define discovery, Targa will identify the items needed for review and the associated timeframes for such review. This includes data acceptance, formal report acceptance, GIS alignment, repair history, previous operations records history, construction records, corrosion program data, and field reports. This information will be analyzed before a condition can be determined to be discovered. Targa will capture within its Integrity Management Plan the specifics of the Discovery of Condition process to align with the required 180-day interval and/or PHMSA notification process if the 180-day interval cannot be met.

Targa is currently revising the Liquid Integrity Management Plan and will submit the revised process for "Discovery of a Condition" by July 1, 2023.

If you have any questions, please contact me at 713-584-1632.

Regards,



Gregg Johnson
Director of Pipeline Compliance
Targa Resources Corp

cc: Bill Grantham, VP Operations
Clark White, Executive VP Operations
Julie Pabon, Senior Counsel, Targa Resources