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July 12, 2023

Via email, confirmed by nationally recognized overnight courier

Mr. Bryan Lethcoe
Director, Southwest Region PHMSA
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner Ste. 1110
Houston, Texas 77074

RE: CPF 4-2023-054 NOA ; Notice of Amendment

Dear Mr. Lethcoe;

On June 13, 2023, Navigator Borger Express LLC received a Notice of Amendment (NOA) from your office relating to a series of PHMSA inspections that were conducted on Navigator Borger Express facilities located in Oklahoma and Texas from January 24, 2022, through May 20, 2022. In that letter PHMSA outlines one (1) area of possible inadequacy to procedures in regard to 49 CFR 195 regulations. Navigator would like to respond to the alleged inadequacy in the NOA. The allegation is first repeated below, and the Navigator response immediately follows in bold text.

Alleged Inadequacy in NOA:

§ 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.

§ 195.561 When must I inspect pipe coating used for external corrosion control?

(a) You must inspect all external pipe coating required by § 195.557 just prior to lowering the pipe into the ditch or submerging the pipe.

On March 9, 2022, during the pipeline construction inspection near the Canadian Pump Station, PHMSA observed a field coating thickness circumferentially 36, 25, 25, and 24 mils at the weld number 4ATI1133(Joint number ML4-5017). Navigator used 2100 volts based on the carrier pipe coating thickness on the SPY holiday detector. However, NACE SP0188 (the manufacturer recommended industry standard) requires a higher voltage (3000 volts) for coating thickness in the range of 21 to 40 mils. Per NACE SP0188, the voltage setting must be calculated by considering the coating thickness and the applied voltage varies for different coating thicknesses.

Therefore, Navigator's written procedures for conducting operations, maintenance, and emergency preparedness and response activities were inadequate to ensure safe operation of a pipeline facility in accordance with § 195.402(c)(3). Navigator must amend section 14.2 of

NES Construction Standards Pipeline Construction (Doc No: NES-CONST-1001) to ensure that its holiday detector voltages are set based on the coating thickness applied on field coated joints.

Navigator Borger Express Response:

Navigator has amended section 14.2 of NES Construction Standards Pipeline Construction (Doc No: NES-CONST-1001) to ensure that its holiday detector voltages are set based on the coating thickness applied on field coated joints. Navigator respectfully submits in the response NES-CONST-1001 Rev. B with an approved date of April 12, 2023. Section 14.2 of the procedure states:

[“CONTRACTOR shall furnish an approved high voltage electronic holiday detector and shall check all coatings applications immediately after coating and wrapping and prior to lowering into the trench. FBE coated pipe and weld joints shall be inspected with a holiday detector (Jeep) set at 125 volts/ mil of the minimum specified coating thickness for the carrier pipe or per the coating manufacture instructions.”]

Sincerely,

NAVIGATOR BORGER EXPRESS LLC



Vidal Rosa
Sr. Vice President of Operations
Navigator Energy Services

Attachments: NES-CONST-1001 Rev. B