



Targa Resources Operating, LLC
811 Louisiana, Suite 2100
Houston, TX 77002

November 18, 2024

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

CPF 4-2024-049-NOA

Dear Mr. Lethcoe:

Targa Resources Operation, LLC's (Targa) has reviewed the referenced Notice of Amendment (NOA) Final Order, which identified one apparent inadequacy in Targa's operations and maintenance procedures for liquid pipelines during PHMSA's inspection of the crude oil gathering system on the Fort Berthold Reservation in North Dakota during the months of February 27 to August 23, 2023. In the referenced NOA, PHMSA required Targa to amend its procedures to identify and designate the valves necessary for the safe operation of its pipeline facility by November 21, 2024. In response to the NOA, Targa has updated its Valve Maintenance Procedure to correct the inadequacy as described below. A copy of the amended procedure is attached to this letter.

PHMSA's NOA included the following finding:

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

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

(b)

(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:

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(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.

§ 195.420 Valve maintenance.

(a) Each operator shall maintain each valve that is necessary for the safe operation of its pipeline systems in good working order at all times.

NOTE:

Targa's written procedures for conducting operations and maintenance activities were inadequate to provide for safe operation of a pipeline facility in accordance with § 195.402(c)(3). Specifically, Targa's written procedures failed to identify valves necessary for the safe operation of its pipeline system. Identification of these valves in an operator's written



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procedures is necessary to operate, maintain, and repair its pipeline system in accordance with § 195.420(a).

Targa must amend its procedures to identify and designate the valves necessary for the safe operation of its pipeline facility.

Targa's response:

In Targa's November 16, 2023, response to the previously identified preliminary findings, Targa provided a newly developed Pipeline Valves Criticality Guideline flowchart via the Pipeline Compliance Portal, which Targa set up to provide the PHMSA inspector supplemental information throughout the inspection process. The Pipeline Valves Criticality Guideline flowchart identifies and designates valves necessary for the safe operation of Targa's pipeline system. Targa has amended its Valve Maintenance Procedure to add the Pipeline Valves Criticality Guideline flowchart to ensure all valves necessary for the safe operation of Targa's pipeline systems are identified and designated.

Please find the attached amended Valve Maintenance Procedure.

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

Regards,

Gregg Johnson

Gregg Johnson
Director of Pipeline Compliance
Targa Resources Corp

cc: John Laeger, VP Senior G&P Operations
Julie Pabon, Senior Counsel, Targa Resources