

June 26, 2025

Sent via Email and Certified Mail

Mr. Brian Lethcoe
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner Suite 630
Houston, Texas 77074

Subject: Navigator Response to Notice of Amendment CPF 4-2025-028 NOA

Dear Mr. Lethcoe,

Thank you for the opportunity to respond to the Notice of Amendment issued following PHMSA's recent inspection of Navigator Panhandle Holdco LLC and Navigator PH Crossing pipeline facilities. We appreciate the thorough review and recognize the importance of continually improving our procedures to ensure the safe and compliant operation of our system.

Navigator has reviewed each item cited in the Notice and is committed to promptly addressing the deficiencies identified. Our responses and planned actions are summarized below:

1. Inadequate Procedures for Investigating and Analyzing Pipeline Accidents and Failures (195.402(c)(5), 195.402(e)(9), 195.405(c)(5)(i-iii))

Navigator acknowledges that our O&M manual (Effective Date September 2023) did not contain the required detail regarding post-failure analysis and documentation. We are updating our procedures to include:

- Structured failure investigation protocols
- Analysis of valve shutoff timing and effectiveness
- Development of post-failure summaries
- Incorporation of lessons learned into future operations

These revisions will be completed and implemented by the targeted date of July 31, 2025.

2. Inaccurate Regulatory Citations and Ambiguity in Notification and Recordkeeping Requirements (195.402(c)(3))

We have identified and corrected the inaccurate references within Sections 1.2.1, 1.2.2, and 1.3 of our procedures. Updates include:

- Accurate references to notification timeframes under 195.52, 195.63, and 195.417
- Clarification of regulatory expectations where timeframes are not explicitly stated
- Removal or revision of outdated regulatory citations

Revised procedures will be reviewed with appropriate personnel and integrated into our document control system by the targeted date of July 31, 2025.

**3. Lack of Procedures for Remedial Actions on Inoperable Rupture Mitigation Valves
(195.402(c)(3), 195.420(f))**

We are updating our valve integrity procedures to include:

- Specific criteria for identifying inoperable or ineffective rupture mitigation valves
- Remedial actions including repair, replacement, or operational restrictions
- Documentation and escalation protocols

This update will be finalized by July 31, 2025, with applicable training provided to field personnel by October 31, 2025.

**4. Inadequate Baseline Assessment Requirements in Integrity Management Program
(195.452(c)(1)(i))**

Navigator acknowledges the need to align its baseline assessment methodology with current PHMSA expectations. Accordingly, we are revising our IMP to:

- Require in-line inspection tools as the default baseline assessment method unless impractical
- Define criteria for determining impracticality with appropriate justification
- Phase out hydrostatic testing as a primary baseline method for new or converted pipelines

We anticipate finalizing these revisions by July 31, 2025, with subsequent updates to our Baseline Assessment Plan and supporting documentation.

Navigator is committed to full compliance with 49 CFR Part 195 and appreciates PHMSA's guidance. We will provide copies of the revised procedures and documentation upon completion and welcome any additional input or clarification needed during this process.

If you have any questions or require further details, please don't hesitate to contact me directly at (432) 978-8051 or vrosa@nesmidstream.com

Kindest Regards,



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