U.S. Department of Transportation

Pipeline and Hazardous Materials Safety Administration

8701 S. Gessner, Suite 630
Houston TX 77074

VIA ELECTRONIC MAIL TO: mmeloy@targaresources.com

December 8, 2025

Matthew Meloy
Chief Executive Officer
Targa Resources, LLC
811 Louisiana Street
Suite 2100
Houston, Texas 77002

CPF No. 4-2025-059-NOPSO

Dear Mr. Meloy:

Enclosed is a Notice of Proposed Safety Order (Notice) issued in the above-referenced case. The Notice proposes that Targa Resources, LLC, take certain measures with respect to its Wildcat Junction pump station in Winkler County, Texas, to ensure pipeline safety. Your options for responding are set forth in the Notice. Service of this Notice by electronic mail is deemed effective upon the date of transmission and acknowledgment of receipt, or as otherwise provided under 49 CFR § 190.5.

We look forward to a successful resolution to ensure pipeline safety. Please direct any questions on this matter to me at (713) 773-7215.

Sincerely,

Bryan Lethcoe
Director, Southwest Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

Enclosure: Notice of Proposed Safety Order
Copy of 49 C.F.R. § 190.239

Cc: Linda Daugherty, Deputy Associate Administrator for Field Operations, OPS
Jordan North, Specialist ES&H, Targa Resources, LLC,
jnorth@targaresources.com

Gregg Johnson, Director of Pipeline Compliance, Targa Resources LLC, gjohnson@targaresources.com
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DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
SOUTHWEST REGION
HOUSTON, TEXAS

In the Matter of	)	
Targa Resources, LLC,	)	**CPF No. 4-2025-059-NOPSO**
Respondent	)	

NOTICE OF PROPOSED SAFETY ORDER

Introduction and Purpose

The Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), is issuing this Notice of Proposed Safety Order (NOPSO or Notice) to Targa Resources, LLC (Targa or Respondent) pursuant to the authority provided in 49 U.S.C. § 60117 and 49 CFR § 190.239. As explained in more detail below, PHMSA has initiated an investigation of an accident that occurred on October 16, 2025, at Targa's Wildcat Junction Pump Station (Wildcat Junction PS) in Winkler County, Texas. Three employees of a third-party contractor, K&K Inc., were injured during the accident, two of whom were hospitalized and one of whom remains in critical condition. The accident also resulted in the release of 6.4 barrels of natural gas liquids (NGLs). The Wildcat Junction PS is a hazardous liquid pipeline facility subject to PHMSA's jurisdiction pursuant to the Pipeline Safety Act, 49 U.S.C. § 60101 *et seq.*, and Pipeline Safety Regulations, 49 CFR Parts 190 to 199.

PHMSA's ongoing investigation indicates that conditions may exist at the Wildcat Junction PS that pose a pipeline integrity risk to public safety, property, or the environment. Specifically, the investigation indicates that Targa does not have appropriate controls in place to supervise the work of personnel performing operations and maintenance activities, that Targa's failure to adequately supervise the work of those personnel has coincided with multiple safety-related incidents and risks at the Wildcat Junction PS, and that the absence of these controls is creating an ongoing safety risk for Targa personnel and an integrity risk for the hazardous liquid pipeline facilities at the Wildcat Junction PS. The purpose of this NOPSO is to provide Targa with notice of the preliminary findings of PHMSA's ongoing investigation and to propose the corrective measures that can be taken to ensure that the public, property, and the environment are protected from this pipeline integrity risk.

Background

The Wildcat Junction PS is part of the Grand Prix West pipeline system, which transports natural gas liquids (NGLs) from Ramsey Meter Station in Reeves County, TX to PS8 Junction in Johnson County, TX. The Grand Prix West pipeline system includes the 16-inch GPX-B pipeline, the 20-inch GPX-C pipeline, and the 24-inch GPX-D pipeline. The Wildcat Junction PS, which is located in Winkler County, Texas, receives NGLs from the 16-inch GPX-B pipeline and delivers NGLs into the 20-inch GPX-C pipeline.

On the morning of October 16, 2025, an accident occurred at the Wildcat Junction PS that injured three employees of K&K Inc., a third-party contractor, who were performing onsite operations and maintenance activities for Targa. Two of the employees were taken to the hospital, and one remains in critical condition. Targa notified the National Response Center (NRC) of the accident later that day, and PHMSA responded by initiating an investigation. Targa's NRC notification estimated the size of the NGL release at 6.4 barrels. The preliminary findings of that investigation are as follows.

Preliminary Findings

- The Wildcat Junction PS is part of the Grand Prix West pipeline system. The Grand Prix West pipeline system includes the 16-inch GPX-B pipeline, the 20-inch GPX-C pipeline, and the 24-inch GPX-D pipeline. These three pipelines are connected in a series and transport NGLs in an easterly direction from Ramsey Meter Station in Reeves County, TX to PS8 Junction in Johnson County, TX. The Wildcat Junction PS receives NGLs from the 16-inch GPX-B pipeline and delivers NGLs into the 20-inch GPX-C pipeline.

- The Wildcat Junction PS is a new facility that receives NGLs from the 16-inch GPX-B pipeline and delivers NGLs into the 20-inch GPX-C pipeline. The Wildcat Junction PS includes four pump units (#110, #125, #140, and #155). Targa completed the commissioning of these four pump units on October 14, 2025.

  From October 15 to October 16, 2025, Targa's operations team conducted a series of troubleshooting activities to bring the pump units online.

- On October 16, 2025, Targa's operations team brought Rockwell Automation (a pump automation vendor) onsite to assist with ongoing troubleshooting activities. While attempting to bring pump units #140 and 155 online. a 3rd party inspector from TKO Field Services, along with a construction crew from K&K Inc., Targa's construction contractor, accessed the hinge pin cap on the check valve on the 30-inch system to check the position of the "flapper." A flapper in a check valve acts as a one-way gate

that allows fluid to flow in a single direction while preventing it from flowing backward.

- The valve hinge pin cap has a different design on the 12-inch and 30-inch station piping check valve systems. The valve's hinge pin cap may or may not be a pressure-retaining part of the valve. In this case, the 30-inch check valve is equipped with a safely removable hinge pin cap that can be accessed during pressurization, whereas the 12-inch check valve does not have a safely removable hinge pin cap during pressurization.[1]

- The foreman from K&K removed the bolts on the hinge pin cap on the 12-inch check valve. This 12-inch line was pressurized at the time of the accident.[2]

- At approximately 9:53am on October 16, 2025, the pump station's emergency shutdown (ESD) system triggered an alarm based on detected gas. At the same time, Targa personnel in a nearby construction trailer heard a commotion outside. The Targa personnel responded to the area and saw a vapor cloud near the pump unit #110 on the 12-inch line. The valve's hinge pin and its cap had ejected and injured three contractor personnel onsite.

- At approximately 9:54 AM, an individual at the scene called 911. Two of the injured personnel were taken to the hospital by ambulance. One person took himself to the hospital to get checked out because he had inhaled the fumes from the released product. Two of the individuals were discharged from the hospital, although one of them was later readmitted. One individual is still in critical condition and hospitalized in Lubbock, TX.

- According to Targa, operator personnel were not aware that the contractor crew was working within the facility on October 16, 2025, even though the contractor crew had been issued a Job Safety Analysis (JSA) work permit.

- PHMSA's preliminary investigation indicated that Targa did not maintain an accurate list of personnel onsite on October 16, 2025. Once PHMSA raised concerns about potential incomplete personnel list, Targa resubmitted a revised personnel list for October 16, 2025.

- PHMSA's interviews and review of daily safety reports discovered evidence of multiple safety incidents and near misses on the construction project prior to the

[1] PHMSA has not been provided with any additional information on the manufacturing specifications of these 12-inch and 30-inch valves.
[2] In the course of its investigation, PHMSA received from Targa a copy of a Job Safety Analysis work permit which authorized the K&K crew to perform leak checks and startup assistance on October 16.

accident on October 16, 2025. The daily safety reports noted incidents where valves impacted the ground while being unloaded, where damage was discovered on facility components with no clear origin or culprit for the damage, and where equipment fell and injured construction employees.

- Several witnesses informed PHMSA that K&K had previously performed unsafe operations on the project, including jack hammering near an active NGL line and attempting to lift an active NGL pipeline with a sling to be placed on I-beam supports. However, neither of these incidents were recorded as near misses or recordables in daily safety reporting.

- Targa's Pipeline superintendent had previously instructed K&K to suspend unsafe operations. K&K continued to work on the site and it is unclear whether corrective measures were put in place by Targa to ensure such unsafe operations did not recur.

- There was no lock or other gate security at the construction project, allowing unauthorized access at the site.

- Records provided to PHMSA after the accident indicated that none of the individuals on the K&K crew were OQ-qualified to perform work on the valve.

- The Wildcat Junction PS is now shut-in and isolated, but the mainline is still in service.

- The investigation of the Failure is on-going, and information could change. These preliminary findings may be amended based on further findings during the investigation.

Proposed Issuance of Safety Order

Section 60117(m) of Title 49, United States Code, provides for the issuance of a safety order, after reasonable notice and the opportunity for a hearing, requiring corrective measures, which may include physical inspection, testing, repair, or other action, as appropriate. The basis for making the determination that a pipeline facility has a condition or conditions that pose a pipeline integrity risk to public safety, property, or the environment is set forth both in the above-referenced statute and 49 CFR § 190.239, a copy of which is enclosed.

After evaluating the foregoing preliminary findings of fact, and having considered the characteristics of the Wildcat Junction PS, including pressures necessary to transport the products; the hazardous nature of the products, natural gas liquids, which are flammable and toxic; the recent history of unsafe construction and operations activities at the Wildcat Junction PS; the failure by Targa to adequately monitor work and exercise control of work at the Wildcat Junction PS; the uncertainty as to the root cause or causes of the accident; and the possibility that the same root causes of the accident may continue at the Wildcat Junction PS and could lead to additional

accidents, it appears that the continued operation of the Wildcat Junction pump station without corrective measures would pose a pipeline integrity risk to public safety, property, or the environment. Accordingly, corrective measures are necessary to mitigate the pipeline integrity risk of the pipeline system to protect public safety, property, and the environment.

Accordingly, PHMSA issues this Notice of Proposed Safety Order to notify Respondent of the proposed issuance of a safety order and to propose that Respondent take measures specified herein to address the potential risk.

Proposed Corrective Measures

"Affected Segment" – The "*Affected Segment*" means the 12-inch station piping and valve feeding into the pump unit #110, all piping, pump units, measurement facilities, and appurtenant facilities at Wildcat Junction PS.

"Affected Facility" – The "*Affected Facility*" means all station piping, pump units, measurement facilities, valves, actuators, control devices, pressure relief devices, SCADA equipment, sensors, fabricated assemblies, and appurtenant facilities at the Wildcat Junction PS in Winkler County, Texas.

Director – The "*Director*" means the Director, PHMSA, Office of Pipeline Safety, Southwest Region. The Director's address is 8701 South Gessner Road, Suite 630, Houston, TX 77074.

Pursuant to 49 U.S.C. § 60117(m) and 49 CFR § 190.239, PHMSA proposes to issue to Targa a safety order incorporating the following remedial requirements with respect to the affected pipeline.

1. ***Root Cause Failure Analysis.*** Within 60 days following issuance of the Safety Order, complete a root cause failure analysis (RCFA) and submit a final report of this RCFA to the Director. The RCFA must be supplemented or facilitated by an independent third-party acceptable to the Director and must document the decision-making process and all factors contributing to the failure. Respondent must ensure that all reports, whether draft or final, are made available in their entirety to the Director at the same time they are made available to Respondent. The final report must include findings and any lessons learned and whether the findings and any lessons learned are applicable to other locations within Targa's pipeline system.
2. ***Repair Plan.*** Within 90 days following issuance of the Safety Order, the following information must be submitted in writing to the Director.

    a. Targa must submit detailed repair plans for the *Affected Segment,* to ensure that it meets the requirements of 49 CFR § 195.422.

    b. The Repair Plan must specify how the *Affected Facility* will be protected from unauthorized entry in accordance with 49 CFR § 195.436. The Repair

Plan must include security patrolling for the *Affected Facility* and identify the methods and frequencies of such patrols.

c. The Director may approve the Repair Plan incrementally without approving the entire plan.

d. Once approved by the Director, the Repair Plan will be incorporated by reference into this Order.

e. The Repair Plan must specify in detail the procedures and plans to bring the pump units back in service. The Repair Plan must include the list of personnel that are qualified under the provisions of 49 CFR 195 Subpart G to perform work under the Repair Plan. This should include the roles and responsibilities of the personnel during the restart. The Repair Plan must specify the Targa control center points of contact and include the control room's shift change information. A copy of the shift change information must be provided daily to the Director until the Repair Plan is completed.

f. The Repair Plan must identify and specify the position of each valve in the *Affected Facility*, the positions confirmed with the control center, and written documentation of the valve positions and control center confirmation provided to the Director during the completion of the repairs.

g. The Repair Plan must include a description of the communications process with the control center and the Management of Change procedures, including documentation, that will be used for any changes made to the operating system, including all operational and pressure restrictions. The Restart Plan must also identify how any operation issues will be communicated between the control center and Targa's operations team, including identifications of specific personnel.

h. The Repair Plan must be implemented only during daylight hours and include sufficient in-person monitoring to ensure no abnormal operations occur.

i. The Repair Plan must include advance communications with local emergency response officials.

j. The Repair Plan must include a review of the *Affected Facility* for any abnormal operating conditions. Targa must address any findings that require remedial measures to be implemented.

3. ***Emergency Response Procedures.*** Within 60 days following issuance of the Safety Order, Targa must submit to the Director documentation of a review of its emergency

response procedures with personnel involved in operating the Wildcat Junction PS including identification of previous deficiencies, to ensure all operating personnel are prepared to respond appropriately. Documentation of the review must include signed attendance sheets noting the date of the meeting and copies of any materials presented or provided during the review.

4. ***Control of Work and Management of Change Procedures.*** Within 60 days following issuance of the Safety Order, Targa must submit its complete Control of Work and Management of Change procedures to the Director for review and approval. The Operator must review its Control of Work and Management of Change procedures with personnel involved in operating the Wildcat Junction PS, identify deficiencies, and ensure all operating personnel are prepared to execute these procedures.

5. ***Construction, Commissioning, and Startup Procedures.*** Within 120 days following issuance of the Safety Order, Targa must submit to the Director for approval a review of all Construction, Commissioning, and Startup Procedures and associated training requirements to reduce accidents resulting from startup issues and operator errors. Targa must complete modifications to its Construction, Commissioning, and Startup Procedures and submit a redlined version of the revised procedures showing the changes to the Director for review and approval.

6. ***Operations and Maintenance Procedures and Operator Qualifications***. Within 120 days following issuance of the Safety Order, Targa must submit to the Director for approval a review of its written Operations and Maintenance Procedures and Operator Qualification Program to identify deficiencies or inadequacies that cause or contribute to safety risks and corresponding programmatic changes or actions aimed at eliminating safety risks. This review must include, but is not limited to, all Operations and Maintenance Procedures and associated training requirements to reduce accidents resulting from maintenance issues and operator errors. In addition, Targa must perform a complete review of its Operator Qualification Program including procedures, covered tasks, training requirements, qualification and re-qualification requirements, span of control, and Abnormal Operating Conditions. Targa must complete modifications to its Operating and Maintenance Procedures and Operator Qualification Program and submit a redlined version of the revised procedures showing the changes to the Director for review and approval.

Other Requirements:

1. **Approvals.** With respect to each submission under the Safety Order that requires the approval of the Director, the Director may: (a) approve, in whole or part, the submission; (b) approve the submission on specified conditions; (c) modify the submission to cure any deficiencies; (d) disapprove in whole or in part, the submission, directing that Respondent modify the submission, or (e) any combination of the above. In the event of approval, approval upon conditions, or modification by the Director,

Respondent shall proceed to take all action required by the submission as approved or modified by the Director. If the Director disapproves all or any portion of the submission, Respondent must correct all deficiencies within the time specified by the Director and resubmit it for approval.

2. **Extensions of Time.** The Director may grant an extension of time for compliance with any of the terms of the Safety Order upon a written request timely submitted demonstrating good cause for an extension.

3. **Reporting.** Submit quarterly reports to the Director that: (1) include all available data and results of the testing and evaluations required by this Order; and (2) describe the progress of the repairs or other remedial actions being undertaken. The first quarterly report is due on April 1, 2025. The Director may change the interval for the submission of these reports.

4. **Documentation of the Costs.** It is requested that Respondent maintain documentation of the costs associated with implementation of the Safety Order. Include in each monthly report submitted, the to-date total costs associated with: (1) preparation and revision of procedures, studies and analyses; (2) physical changes to pipeline infrastructure, including repairs, replacements and other modifications; and (3) environmental remediation.

The actions proposed by this Notice of Proposed Safety Order are in addition to and do not waive any requirements that apply to Respondent's pipeline system under 49 CFR Parts 190 through 199, under any other order issued to Respondent under authority of 49 U.S.C. § 60101 *et seq*., or under any other provision of Federal or state law.

After receiving and analyzing additional data in the course of this proceeding and implementation of the corrective measures, PHMSA may identify other safety measures that need to be taken. In that event, Respondent will be notified of any proposed additional measures and, if necessary, amendments to the Safety Order.

Response to this Notice

In accordance with § 190.239, you have 30 days following receipt of this Notice to submit a written response to the official who issued the Notice. If you do not respond within 30 days, this constitutes a waiver of your right to contest this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Safety Order. In your response, you may notify that official that you intend to comply with the terms of the Notice as proposed, or you may request that an informal consultation be scheduled (you will also have the opportunity to request an administrative hearing before a safety order is issued). Informal consultation provides you with the opportunity to explain the circumstances associated with the risk condition(s) alleged in the notice and, as appropriate, to present a proposal

for a work plan or other remedial measures, without prejudice to your position in any subsequent hearing.

If as a result of the informal consultation, you and PHMSA agree on a plan and schedule for you to address each identified risk condition, we may enter into a written consent agreement (PHMSA would then issue an administrative consent order incorporating the terms of the agreement). If a consent agreement is not reached, or if you have elected not to request informal consultation, you may request an administrative hearing in writing within 30 days following receipt of the Notice or within 10 days following the conclusion of an informal consultation that did not result in a consent agreement, as applicable. Following a hearing, if the Associate Administrator finds the facility to have a condition that poses a pipeline integrity risk to the public, property, or the environment in accordance with § 190.239, the Associate Administrator may issue a safety order.

Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

In your correspondence on this matter, please refer to **CPF No. 4-2025-059-NOPSO** and for each document you submit, please provide a copy in electronic format whenever possible.

_____ _____

Bryan Lethcoe Date issued
Director, Southwest Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration