



March 18, 2021

Mr. Dustin B. Hubbard
Director, Wester Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Re: CPF 5-2021-007-NOA

Dear Mr. Hubbard,

Third Coast Midstream, LLC (Third Coast) is in receipt of your Notice of Amendment dated March 4, 2021 (Notice). As described in the Notice, personnel of the Pipeline and Hazardous Materials Safety Administration (PHMSA) performed a virtual inspection of the Third Coast control rooms located in Houston, Texas and Texas City, Texas where selected items were found to be inadequately described and/or executed in Third Coast's control room management procedures (Procedures), communication plan, and training program. Third Coast does not contest these findings and is currently working to remedy these findings as Third Coast is committed to ensuring full compliance with all applicable regulations as documented in the Notice. Please find Third Coast's response to the findings excerpted from the Notice below:

1. **PHMSA WARNING:** Third Coast must revise their Procedures to define the process controllers must follow when transferring to a backup control room and include in the Procedures a formalized process for transferring responsibilities to another location, including shift-change forms or other documentation.

THIRD COAST RESPONSE: Third Coast will revise the Procedures in question to better define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. Third Coast will also revise the Procedures in question to better define a controller's authority and responsibility to make decisions and take actions during normal operations. Additionally, Third Coast will revise the Procedures in question to include transferring operations to another location making sure to include a formal transfer of responsibilities, shift-change forms and/or other documentation, and the responsibilities of all personnel involved.

2. **PHMSA WARNING:** Third Coast must revise their Procedures to address replacement controllers, including when a controller must leave without a replacement, supervisory duties to contact replacements, and situations in which replacement controllers are needed on an urgent basis.

THIRD COAST RESPONSE: Third Coast will revise the Procedures in question to better define the roles and responsibilities during normal, abnormal, and emergency operating conditions. Third Coast will also revise the Procedures in question to include the shift-change handover process and documentation in use. Third Coast will include in their revision situations where the on-duty controller may have to leave the control room and information required to exchange and understand prior to a relief controller taking control of the console. Third Coast will update the Procedures in question to include contacting a supervisor to find a replacement controller to ensure that a controller's hours of service are considered in selecting the relief controller. Third Coast will also include in their revision, a process for oncoming controllers to report their fitness for duty, and if a controller is not fit for duty, the method by which this is reported and documented.

3. **PHMSA WARNING:** Third Coast must revise their Procedures to adequately define the roles, responsibilities, and qualifications for each person with the authority to direct or supersede the technical actions of a controller, and how that authority would be implemented and documented.

THIRD COAST RESPONSE: Third Coast will revise the Procedures in question to better define the roles and responsibilities during normal, abnormal, and emergency operating conditions. Third Coast will revise the roles and responsibilities detailed in CRM-002, Section 2.6, Authority to Direct or Supersede a Controller's Actions, as it was understood to be contradictory to statements made by the controller being able to control either console. Third Coast will revise the Procedure in question to clearly define how those with authority to supersede or direct a controller's actions would execute and document this occurrence.

4. **PHMSA WARNING:** Third Coast must revise the communication plan to include all critical locations that would require manual operation if a loss of communications occurred.

THIRD COAST RESPONSE: Third Coast will revise the communication plan in question regarding the verification, testing, and documentation of the internal communication plan. Additionally, Third Coast will revise the communication plan to identify the critical assets and locations to deploy personnel to for manual operation of the pipeline.

5. **PHMSA WARNING:** Third Coast must revise their Procedures to clearly provide how controllers will be trained in fatigue mitigation strategies and how off-duty activities contribute to fatigue.

THIRD COAST RESPONSE: Third Coast will revise the Procedures in question to further clarify how controllers will be trained in fatigue mitigation strategies, including information on how off-duty activities contribute to fatigue.

6. **PHMSA WARNING:** Third Coast must revise their training program to clearly describe the process for training controllers in each phase identified, develop and carry out oral examinations to ensure consistency in training and evaluation, and develop pass/fail criteria for each phase of training. Additionally, Third Coast must revise their procedure for reviewing the training program content (including fatigue mitigation education) to determine effectiveness, metrics used for the review, and identify any improvements necessary or document no improvements were needed.

THIRD COAST RESPONSE: Third Coast will revise their training program in question to clarify included references to two different final evaluations as documented in CRM-008: Training, Sections 8.3.4 and 8.3.5. Additionally, Third Coast will update CRM-APP-008: Training in accordance with Operator Qualification (OQ) evaluation requirements. Third Coast will also revise CRM-APP-008: Training, Section 8.3.5, Final Evaluation, to include measures to ensure it is performed effectively and consistently. Third Coast will also revise training Phases I/II/III to better identify the pass/fail criteria and include the passing scores that should be achieved during training. Third Coast will revise their training program in question to include the review cycle of the training program, which will be once every calendar year, not to exceed fifteen months, and Third Coast will document how the training program is reviewed and how that review is documented. Third Coast will also revise an incorrect reference to document CRM-APP-801: Review of Controller Training that includes the wrong document name. Third Coast will revise document CRM-004: Fatigue Management Rev. 10, Revised August 14, 2019, Section 4.8: Fatigue Management Strategies to clearly identify how Third Coast will perform a review of the Fatigue Mitigation Training material and which portions of the training material will be reviewed. Additionally, the process of reviewing CRM-004: Fatigue Management Rev. 10, Revised August 14, 2019, will be described and review documentation and measures will be identified.

7. **PHMSA WARNING:** Third Coast must revise their training procedures to address how controllers will be trained on abnormal operating conditions that are likely to occur simultaneously or in sequence.

THIRD COAST RESPONSE: Third Coast will revise the training procedures in question to include descriptions of Abnormal Operating Conditions (AOC) that may occur simultaneously or in sequence. Third Coast will revise CRM-008: Training, Section 8.2 Program, to better document how the controllers are to be trained. Third Coast will also revise the training procedures in question to include information regarding the method that controllers are trained regarding AOC that may occur.

8. **PHMSA WARNING:** Third Coast must revise their training procedures to address how controllers will be trained on their responsibilities for communication under the operator's emergency response procedures.

THIRD COAST RESPONSE: Third Coast will revise the training procedures in question to better describe the controller's training on their responsibilities for communication during an emergency response. Third Coast will revise CRM-008: Training, Section 8.2 Program, to identify how controllers will be trained on their responsibilities for communication under the Third Coast Midstream emergency response procedures.

9. **PHMSA WARNING:** Third Coast must revise their training procedures to address how controllers will be trained for a working knowledge of the pipeline system, especially during the development of abnormal operating conditions.

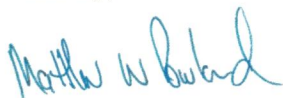
THIRD COAST RESPONSE: Third Coast will revise the training procedures in question to include training on AOC and the identification of and response to a developing AOC. Third Coast will revise CRM-008: Training, Section 8.2 Program, to include training that will provide a working knowledge of the pipeline system with emphasis on the development of AOC.

10. **PHMSA WARNING:** Third Coast must revise their Procedure to create a means of documenting why a deviation was necessary for the safe operation of the pipeline facility.

THIRD COAST RESPONSE: Third Coast will revise the Procedures and supporting document in question, CRM-APP-101, Control Room Management Deviation Form, to include, as part of the process, a method for documenting why deviations from the Procedure were necessary for the safe operations of the pipeline facility.

Third Coast requests a period of 120 days from the date the Notice was received to remedy the above enumerated findings in accordance with the responses provided herein. Since the time of PHMSA's original audit conducted in July 2020, Third Coast has divested the asset that was the primary source for PHMSA's findings in the Notice, and Third Coast has also hired a new Manager of CRM and Alarms. Thank you for your consideration of Third Coast's responses to the Notice. Please reach out to our leadership with any questions or concerns you may have regarding these responses.

Sincerely,



Matthew W. Rowland
President & CEO
Third Coast Midstream, LLC