

NOTICE OF AMENDMENT

VIA E-MAIL TO MR. CRAIG COLLINS

March 7, 2022

Mr. Craig Collins
Chief Operations Officer and
Senior Vice President
Western Midstream Partners, LP
9950 Woodloch Forest Dr., Suite 2800
The Woodlands, TX 77380

CPF 5-2022-018-NOA

Dear Mr. Collins:

From November 1 through 5, 2021, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, reviewed the written control room management plan, procedures, and records of Western Midstream Partners, LP (Western) in Platteville, Colorado.

On the basis of the inspection, PHMSA has identified apparent inadequacies found within Western's control room management procedures, as described below:

1. § 195.446 - Control room management.

(a) *General.* This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section. The procedures required by this section must be integrated, as appropriate, with the operator's written procedures required by § 195.402. ...

Western's written procedures were inadequate to assure safe operation of a pipeline facility. Specifically, Western did not have and follow written control room management procedures that implemented the requirements set forth in § 195.446. Pursuant to § 195.446(c)(2), each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by conducting a point-to-point verification between SCADA displays and related field equipment when certain conditions are met. In order to conduct a point-to-point verification, an operator must first define and identify Safety Related Points (SRP) for the SCADA system.¹ In practice, Western Midstream maintains a list of Safety Related Points. However, the Western Midstream DOT Pipeline Compliance Control Room Management Plan 4.0 (CRMP) does not indicate how Western defines SRP nor does it include a written procedure that guides the selection of SRPs.

2. § 195.446 - Control room management.

(a)...

(e) ***Alarm management.*** Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1)...

(2) **Identify at least once each calendar month points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities;...**

Western's written procedures were inadequate to assure safe operation of a pipeline facility. Specifically, Western's written alarm management plan, CRMP Section 5-*Alarm Management*, did not provide for effective controller response to alarms because it failed to include procedures for identifying points affecting safety that have been taken off scan in the SCADA host, have had alarms inhibited, generated false alarms, or that have had forced or manual values for periods of time exceeding that required for associated maintenance or operating activities once each calendar month. During the inspection, the Western Midstream control room team was not able to articulate how the review was conducted. Although the Western Midstream SCADA subject matter expert articulated the process the SCADA group is expected to use to review and analyze Alarms and other SCADA data, the CRMP does not contain a written procedure to conduct the review.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*.

¹ See PHMSA Control Room Management Frequently Asked Questions A.16 and C.01 (Rev. Jan. 2018), available at <https://www.phmsa.dot.gov/pipeline/control-room-management/control-room-management-faqs> (last accessed Feb. 7, 2022).

Please refer to this document and note the response options. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in 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 an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Western Midstream Partners, LP maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Dustin Hubbard, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2022-018-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*

cc: PHP-60 Compliance Registry
PHP-500 J. Dunphy (#21-201443)