

March 10, 2023

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

Re: PROPOSED COMPLIANCE ORDER, CPF 5-2022-050-NOPV

Dear Mr. Hubbard:

MountainWest Pipeline (MWP) appreciates the professionalism and thoroughness of the PHMSA staff during the Control Room Management audit conducted February 28 through March 4, 2022. MWP welcomes input from the PHMSA team and recognizes the listed concerns. MWP views this audit process as an opportunity to further improve its Control Room Management program in harmony with our core safety values.

MountainWest Pipeline (MWP), OPID No. 12874, does not contest the allegations in CPF 5-2022-050-NOPV, dated December 19, 2022 and intends to take the actions in the compliance order as detailed below.

Pursuant to 49 U.S.C. § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Mountain West Pipeline LLC a Compliance Order incorporating the following remedial requirements to ensure the compliance of Mountain West Pipeline LLC (Mountain West) with the pipeline safety regulations:

Proposed Compliance Order Item:

- A. In regard to Item 1 of the Notice pertaining to Mountain West's failure to implement the required sections of API RP 1165, Mountain West must conduct an evaluation of its SCADA system for compliance with the requisite sections of API RP 1165 within 30 days of receipt of the Final Order. Mountain West must present to PHMSA a plan for correcting any deficiencies identified through its evaluation of the SCADA system within 90 days of receipt of the Final Order.**

Response:

See attached document titled "MountainWest API RP 1165 PHMSA Correction Plan Feb 2023".

Proposed Compliance Order Item:

- B. In regard to Item 2 of the Notice pertaining to Mountain West's failure to monitor the content and volume of general activity being directed to and required of each controller, Mountain West must amend its procedure in CRM Plan Section 5.6 to provide detailed instructions for conducting, analyzing and documenting each review required by CRM Plan Section 5.6. Mountain West shall complete and submit to PHMSA the procedure amendment within 30 days of receipt of the Final Order. Mountain West shall conduct**

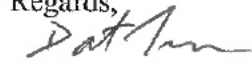
and submit to PHMSA forensic reviews according to the amended CRM Plan Section 5.6 for the years 2020 and 2021 within 90 days of receipt of the Final Order.

Response:

See attached documents titled "Control Room Content Volume and General Activity (forensic) Review for year 2020 PHMSA NOPV #2" and "Control Room Content Volume and General Activity (forensic) Review for year 2021 PHMSA NOPV #2".

MWP has completed all items and request the case be closed. If you have any questions or requests pertaining to this matter, please do not hesitate to contact me or Douglas Brunt, Manager Pipeline Safety, douglas.brunt@mwpipe.com. MWP appreciates the opportunity to work with PHMSA to improve Company procedures and pipeline safety processes.

Regards,



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President
MWP Pipeline