

April 21, 2023

Dustin Hubbard
Director, Western Region
United States Department of Transportation
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave, Suite 110
Lakewood, CO 80228

Dear Mr. Hubbard,

This letter is in response to the Notice of Amendment dated March 24, 2023, regarding the Norgasco 2021 PHMSA inspection.

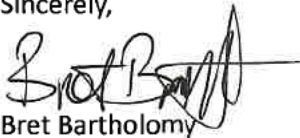
The first inadequacy states we need a procedure for pressure/leak testing the pipeline segments from Hilcorp tie-in to Skid1 which we don't currently have but will add to the Operations & Maintenance manual and will forward a copy within 60 days. It also states we are missing the same for the section of pipe from Skid 1 to Skid 2, but we do have a procedure for checking that section of pipe for leaks annually and documentation is attached.

The second inadequacy states we lack a written procedure to operate the two bypass loops in Skid 1. Procedures will be created and added to the Operations & Maintenance manual and a copy will be provided within 60 days. We will also create and implement a procedure to protect underground plastic main-line valves from ice and freezing. We will forward this procedure within 60 days.

The third inadequacy will be addressed by revising the Operations & Maintenance manual to include the allowable PSV build-up over MAOP. The revision will be forwarded within 60 days.

Please let me know if I need to take further action than described above.

Sincerely,



Bret Bartholomy
VP - Operations