



November 20, 2023

Mr. Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave, Suite 110
Lakewood, Co 90228

RE: WARNING LETTER – CPF 5-2023-034-WL

SFPP, L.P. ("SFPP") acknowledges receipt of the Pipeline and Hazardous Materials Safety Administration's ("PHMSA") Warning Letter CPF 5-2023-034WL (the "Warning Letter") dated November 1, 2023 and related to PHMSA's inspection during the time period of July 10, 2023, to July 13, 2023 (the "Inspection"). SFPP appreciates the opportunity to respond to the allegations set forth below in the Warning Letter:

§ 195.59 Abandonment or deactivation of facilities.

For each abandoned offshore pipeline facility or each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway, the last operator of that facility must file a report upon abandonment of that facility.

(a) The preferred method to submit data on pipeline facilities abandoned after October 10, 2000 is to the National Pipeline Mapping System (NPMS) in accordance with the NPMS "Standards for Pipeline and Liquefied Natural Gas Operator Submissions." To obtain a copy of the NPMS Standards, please refer to the NPMS homepage at <http://www.npms.phmsa.dot.gov> or contact the NPMS National Repository at 703-317-3073. A digital data format is preferred, but hard copy submissions are acceptable if they comply with the NPMS Standards. In addition to the NPMS-required attributes, operators must submit the date of abandonment, diameter, method of abandonment, and certification that, to the best of the operator's knowledge, all of the reasonably available information requested was provided and, to the best of the operator's knowledge, the abandonment was completed in accordance with applicable laws. Refer to the NPMS Standards for details in preparing your data for submission. The NPMS Standards also include details of how to submit data. Alternatively, operators may submit reports by mail, fax or e-mail to the Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation, Information Resources Manager, PHP-10, 1200 New Jersey Avenue, SE., Washington, DC 20590-0001; fax (202) 366-4566; e-mail, "InformationResourcesManager@phmsa.dot.gov. The information in the report must contain all reasonably available information related to the facility, including information in the possession of a third party. The report must contain the location, size, date, method of abandonment, and a certification that the facility has been abandoned in accordance with all applicable laws.

Kinder Morgan failed to file a report upon abandonment for onshore pipeline facilities that cross over, under, or through commercially navigable waterways in accordance with § 195.59(a). Additionally, Kinder Morgan's written L-O&M 226 - Abandoning, Inactivating, and Reactivating Hazardous Liquids Piping, Section 3.2.3 Abandonment Reporting, provides procedures for filing the required report with PHMSA.

Kinder Morgan abandoned the LS-14 pipeline segment that crosses the Willamette River on

December 18, 2021. At the time of the PHMSA inspection, Kinder Morgan still had not reported the abandonment to the National Pipeline Mapping System (NPMS). However, Kinder Morgan filed the requisite report with the NPMS in accordance with § 195.59(a) on July 17, 2023.

SFPP Response:

At the time that PHMSA verbally notified SFPP of the investigation findings, the Company took the following steps:

- *An internal investigation was performed to determine what processes and/or procedures could be improved to ensure the reporting issues do not occur again.*
- *The investigation concluded the following three Liquids Operations and Maintenance (L-O&M) procedures should be updated:*
 - *L-O&M 225, Facility Assessment Process*
 - *L-O&M 226, Abandoning, Inactivating, and Reactivating Hazardous Liquids Piping*
 - *L-O&M 1402, Project Commissioning*
- *These procedures are being updated to ensure the reporting issues identified during the PHMSA inspection do not occur again.*
- *Once the procedures are updated a Management of Change (MOC) will be initiated to communicate the updated procedures to all affected employees.*

SFPP is committed to operating our pipeline systems safely and in compliance with all applicable regulations. Should you have any questions or concerns regarding this response, please call Jaime Hernandez at 713-369-9443, or me at 713-369-6330.

Sincerely,



Wayne G. Simmons

Chief Operating Officer - Products Pipeline

Cc: Thomas P. Otjen, Vice President, Operations Support Group
Jaime A. Hernandez, Director, Codes and Standards, Operations Support Group