



VIA ELECTRONIC MAIL TO: dustin.hubbard@dot.gov

November 21, 2023

Mr. Dustin Hubbard
Director, Office of Pipeline Safety – Western Region
USDOT - PHMSA
12300 West Dakota Ave
Suite 110
Lakewood, CO 80228

Dear Mr. Hubbard

In response to CPF-5-2023-035-NOPV, Contango Resources, LLC (“Contango”) provides the following information and supporting documentation:

- **Regarding Item 1 of the Notice pertaining to Contango’s failure to test and verify the internal communications plan at least once each calendar year, but at intervals not to exceed 15 months:**

Contango has amended its procedures as required. Standard Operating Guideline PL-General-005 details the internal communication plan, which is also referenced in the Contango CRMP under section 5.3. Contango plans to execute a test of the internal communication plan in accordance with section 4 of PL-General-005 as soon as practicable and is prepared to submit documentation of the test to PHMSA.

- **Regarding Item 2 of the Notice pertaining to Contango’s failure to test any backup SCADA systems at least once each calendar year, but at intervals not to exceed 15 months:**

After further review, Contango does not maintain backup SCADA equipment specific only to the pipeline. Therefore, tests may not be performed in accordance with 195.446(c)(4) without creating significant operational and financial impact. Consequently, Contango has amended section 5.4 of the CRMP removing verbiage around back-up SCADA equipment. Additional verbiage has been added requiring the pipeline to be shut in manually during a SCADA failure event in accordance with the internal communication plan detailed in SOG PL-General-005.

Contango believes the information provided demonstrates that the requirements set forth in 195.446(c)(4) do not apply and therefore removal of Item 2 from the Final Order could be warranted.

- **Regarding Item 3 of the Notice pertaining to Contango's failure to monitor the content and volume of general activity being directed to and required of each controller:**

Contango has amended its procedures as required. Section 4 of the Alarm Management Plan within the CRMP (Appendix B) has been added to detail instructions for reviewing and documenting analysis of the volume of activity directed to controllers. Moving forward, in addition to a monthly review of the logbook in the control room, the pipeline supervisor will conduct monthly reviews of alarm history in accordance with section 4 of the Alarm Management Plan. Contango is prepared to submit records of these reviews to PHMSA as requested.

Contango does not find it necessary to contest any of the findings in whole or in part, but willingly provides explanations and documentation to demonstrate action that has been or will be taken to bring the CRMP and associated guidelines into compliance. We are presently working with a consultant to assure that our corrective actions are adequate.

Let us know if more information is required. In addition, please let us know if you would like to schedule a call to further discuss. Contango appreciates your cooperation in this matter.

Sincerely,



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Enclosures: Contango DOT Control Room Management Plan – Rev.1 10-2023
Standard Operating Guidelines – Salt Creek EOR

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