



**VIA ELECTRONIC MAIL TO: [dustin.hubbard@dot.gov](mailto: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-5-2023-036-NOA, Contango Resources, LLC (“Contango”) provides the following information and supporting documentation:

- **Regarding Item 1 of the Notice pertaining to Contango’s failure to maintain procedures that define a process for evaluating facilities to determine if they are a control room:**

Contango has amended its CRMP and procedures as required. Section 1 of the CRMP now includes the following definition of a control room as described in 195.2. Furthermore, Contango has developed and completed an internal assessment of CRM applicability specifically to the Salt Creek Control Room. The completed form is included in Appendix C of the CRMP.

- **Regarding Item 2 of the Notice pertaining to Contango’s failure to maintain procedures that contain a process to evaluate potential contribution of controller fatigue to incidents and accidents during investigations:**

Contango has amended its CRMP and procedures as required. Section 6.26 of the CRMP references the use and review of PHMSA 7000-1 Part E during accident investigations to evaluate the potential contribution of controller fatigue during an accident. Additionally, OPS.08 has been updated to include evaluation of fatigue as a potential contributor in near miss events. Furthermore, Contango is working to develop guidelines defining a formal structured approach to investigation of pipeline incidents.

- **Regarding Item 3 of the Notice pertaining to Contango’s failure to maintain procedures that have a clear process describing roles and responsibilities of controllers when more than one controller is on shift:**

Contango has amended its procedures as required. SOG PL-Control Room-007 pertaining to Controller Responsibility includes verbiage that clearly describes

roles and responsibilities of controllers when more than one controller is on shift. SOG PL-Control Room-007 is also referenced within Section 4 of the CRMP.

- **Regarding Item 4 of the Notice pertaining to Contango's failure to maintain procedures that address controllers' responsibilities in the event of a control room evacuation, and failed to describe circumstances in which a control room evacuation would be necessary:**

Contango has amended its CRMP and procedures as required. PL-Control Room-006 clearly describes control room evacuation procedures along with circumstances in which an evacuation would be necessary. Additionally, Section 4.1.4 of the CRMP now addresses controller responsibilities in the event of a control room evacuation.

- **Regarding Item 5 of the Notice pertaining to Contango's failure to maintain procedures that address who has authority to supersede or direct the specific technical actions of a controller:**

Contango has amended its CRMP and procedures as required. Section 4.1.5 has been added to the plan with the following verbiage: No other positions possess authority to supersede the specific technical actions of a qualified controller. Controllers have authority to deny any unqualified person attempting to supersede.

- **Regarding Item 6 of the Notice pertaining to Contango's failure to maintain procedures that address the types of changes to the SCADA system that constitute additions, expansions, or replacements under the meaning of the CRM rule:**

Contango understands the deficiencies in the existing policies and programs and has engaged a consultant to assist with appropriate updates that meet this request.

- **Regarding Item 7 of the Notice pertaining to Contango's failure to adequately define the terms 'point' and 'safety-related point' as they relate to the Contango SCADA system. Additionally, Contango did not define a process within the CRMP that details implementation of new points or for verification of existing points on the pipeline.**

Contango understands the deficiencies in the existing policies and programs and has engaged a consultant to assist with appropriate updates that meet this request.

- **Regarding Item 8 of the Notice pertaining to Contango's failure to include the following topical areas within the CRMP in relation to alarm management: alarm philosophy, alarm identification, alarm rationalization, detailed alarm design, or alarm implementation:**

Contango understands the deficiencies in the existing policies and programs and has engaged a consultant to assist with appropriate updates that meet this request.

- **Regarding Item 9 of the Notice pertaining to Contango's failure to include procedures within the CRMP to identify and correct inaccurate or malfunctioning alarms. Additionally, the CRMP does not address the process by which alarms are inhibited.**

Contango understands the deficiencies in the existing policies and programs and has engaged a consultant to assist with appropriate updates that meet this request.

- **Regarding Item 10 of the Notice pertaining to Contango's failure to define procedures by which critical set point values and alarm descriptions are determined.**

Contango understands the deficiencies in the existing policies and programs and has engaged a consultant to assist with appropriate updates that meet this request.

- **Regarding Item 11 of the Notice pertaining to Contango's failure to include detailed procedures in the CRMP defining a review process of the alarm management plan at least once each calendar year not to exceed 15 months.**

Contango understands the deficiencies in the existing policies and programs and has engaged a consultant to assist with appropriate updates that meet this request.

- **Regarding Item 12 of the Notice pertaining to Contango's failure to include procedures describing how coordination between control room representatives, operator's management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configurations is managed:**

Contango understands the deficiencies in the existing policies and programs and has engaged a consultant to assist with appropriate updates that meet this request.

- **Regarding Item 13 of the Notice pertaining to Contango's failure to address 195.446(h)(6) in procedures:**

Contango has amended its CRMP and procedures as required. Section 10 of the CRMP has been updated to include team training, noting that all team training exercises must include both controllers and other individuals who would reasonably be expected to operationally collaborate with controllers in the given circumstances. Requirements around team training are in SOG PL-General-004, which is referenced within the CRMP.

- **Regarding Item 14 of the Notice pertaining to Contango's failure to require submission of procedures to PHMSA in accordance with 195.446(i).**

Contango has amended its CRMP as required. Section 11 has been updated with specific verbiage that requires CRM procedures and the CRMP to be made immediately available to PHMSA upon request.

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 also working closely with a consultant to assure that all corrective action is 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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