

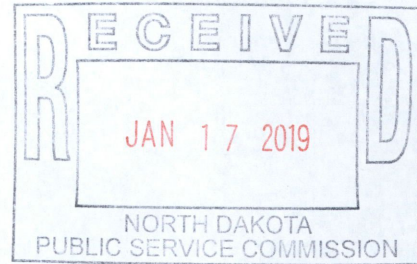


950 17th Street • Suite 1000
Denver, CO 80202
Phone: 303-628-1410 • Fax: 303-628-1420
www.calibermidstream.com

January 16, 2019

Arnie Siverson, Program Manger
ND Gas Pipeline Safety Program
600 East Boulevard Dept. 408
Bismarck, ND 58505-0480

RE: Case No. GS-18-396



Dear Mr. Siverson,

This letter is in response to the Notice of Probable Violation (NOPV) Case No. GS-18-396 dated December 17, 2018 and received January 9, 2019. Caliber Midstream seeks to contest the audit finding in Probable Violation No. 1 that it did not inspect and test pressure safety valve PSV 3070 SN:WR2827F in calendar year 2017. Included with this response you will find additional records from Mercer Valve Co. The records provided with this letter show that PSV 3070 SN:WR2827F was inspected by a Mercer Valve Co. technician on December 24, 2017.

Attached to this response you will find the paperwork regarding PSV 3070. There is hand written work order/sales order completed by the technician, the typed-up sales order for billing, the rough draft of the hand-written valve repair ticket and the packing slip from the company to where the parts were ordered. On page1 of the sales order you can see time was billed for December 24, 2017 and the comments section note PSV 3070 was mentioned. Pages 2 and 3 reiterate Page 1 but is provided in a typed formal version. Page 4 is the initial pretest info and it states PSV 3070 failed and a new o-ring seat needed to be ordered along with gasket kit. Page 5 shows when the order was placed for the required parts from TEAM, due to lead time parts were received January 12, 2018 and the valve was repaired January 15, 2018. A final test report was completed on January 15, 2018 from another technician.

The records provided with this submission demonstrate that PSV 3070 was inspected and tested in the calendar year of 2017 as required by 49 CFR 192.739 (a), Caliber Midstream requests that the Commission revoke Probable Violation No. 1 of Case No. GS-18-396.

Caliber Midstream continues to work diligently with our contractors providing testing and inspection service on our pressure and limiting regulating stations to complete regulatory required inspections on time and within the required timeframe stipulated in the regulations. If you have questions, I can be contacted at 720-630-2658.

Sincerely,

Carol Butero
Director of Regulatory, Safety and Compliance



2 **GS-18-396** Filed: 1/17/2019 Pages: 6
Response to 17 Dec. 2018 Notice of Probable Violation

Caliber North Dakota LLC
Carol Butero

MERCER VALVE COMPANY, INC.

Repair Department

117 Energy St., Ste. 101 • Williston, ND 58801
 Phone: 701-774-6196 • Fax: 701-774-6199

SALES ORDER

CUST. # <i>0050948</i>	
DATE <i>1-15-18</i>	SALESPERSON <i>Erik Belakjon</i>

SOLD TO:

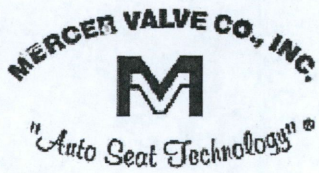
Caliber North Dakota LLC
Brian Videtich
BVidetich@Calibermidstream.com

SHIP TO:

Hay Butte Gas Plant

CUSTOMER ORDER NO.		ORDERED BY	SHIP VIA	FOB POINT	
		<i>Brian Videtich</i>	<i>FS Call</i>	<i>Williston ND</i>	
QUANTITY	STOCK NUMBER/DESCRIPTION			UNIT PRICE	AMOUNT
<i>8</i>	<i>FS Crew (2) Man Crew (12-24)</i>			<i>\$ 140.00</i>	<i>\$ 1120.00</i>
<i>90</i>	<i>Service Truck: Daily Mileage (12-24) Unit # 90</i>			<i>\$ 1.00</i>	<i>\$ 90.00</i>
<i>12</i>	<i>FS Crew (2) Man Crew (1-15)</i>			<i>\$ 140.00</i>	<i>\$ 1680.00</i>
<i>90</i>	<i>Service Truck: Daily Mileage (1-15) Unit # 117</i>			<i>\$ 1.00</i>	<i>\$ 90.00</i>
<i>4</i>	<i>Taylor Spring 05-001315-G:SR (61-110 PSI)</i>			<i>\$ 107.16</i>	<i>\$ 428.64</i>
<i>6</i>	<i>PSV # 4011A, 4011B, 4011C, 4011D</i>				
<i>1</i>	<i>Gasket Kit (PN# 4K626A1) PSV# 3070</i>			<i>\$ 214.30</i>	<i>\$ 214.30</i>
<i>1</i>	<i>Viton - O-Ring Kit (PN# 25429-169) PSV# 3070</i>			<i>\$ 42.84</i>	<i>\$ 42.84</i>
<i>1</i>	<i>Shipping Charges: ND0626 RMOW</i>			<i>\$ 13.18</i>	<i>\$ 13.18</i>
<i>1</i>	<i>Shipping Charges: ND0627 Furmanite</i>			<i>\$ 18.34</i>	<i>\$ 18.34</i>
<i>12</i>	<i>12-24-17: Drove to the Alexander Oil Facility, Tested 8</i>				
<i>13</i>	<i>PSV's there, all PSV's passed. Then Drove to the</i>				
<i>14</i>	<i>Hay Butte Gas Plant, tested 3051A and 3051B.</i>				
<i>15</i>	<i>We had to order parts for PSV 4011A, 4011B, 4011C, 4011D</i>				
<i>16</i>	<i>and PSV 3070. Then Drove back to Williston.</i>				
<i>17</i>	<i>1-15-18: Drove to location we repaired PSV 3070, and then</i>				
<i>18</i>	<i>Changed the Spring in PSV 4011A 4011B 4011C and 4011D.</i>				
<i>19</i>	<i>Then Drove back to Williston.</i>				<i>\$3097.30</i>
<i>20</i>					
MATERIAL RETURNED	PAID OUT	RECEIVED BY		TOTAL	

THIS SLIP MUST ACCOMPANY ALL CLAIMS AND RETURNED GOODS



Sales Order

Form Number:1

73-1226246
 Mercer Valve Company, Inc.
 9609 NW 4TH ST
 OKLAHOMA CITY, OK 73127-2962
 (405) 470-5200

Order Number: **00EC948**
 Order Date: 1/15/2018
 Ship Date: 1/15/2018
 Customer Number: 0059650
 Order Taken By: NLarsen
 Data Entry Location: Williston ND
 Location Credit: North Dakota
 Ship From Location: Williston ND

Sold To:
 Caliber Midstream Partners
 1200 17TH ST
 Suite 2100
 Denver, CO 80202-5835
 United States

Ship To:
 Caliber Midstream
 13811 24TH ST NW
 ALEXANDER, ND 58831-8001
 United States

Confirm To:
 Brian Videtich

RC: Project #:

Customer P.O.	Ship VIA FIELD WORK	COLLECT A/C #	SHIP WITH S/O #	Terms 1% -15 Days or Net 30
---------------	------------------------	---------------	-----------------	--------------------------------

Item Number	Alias Number	Unit	Ordered	Shipped	Back Order	Price	Amount
/RLND	Repair Labor ND FS crew (2) man crew 12-24	EACH	8.000	0.000	0.000	140.0000	1,120.00
/MND	Mileage ND Service truck Daily mileage 12-24 Unit 90	EACH	90.000	0.000	0.000	1.0000	90.00
/RLND	Repair Labor ND FS crew 2 man crew 1-15	EACH	12.000	0.000	0.000	140.0000	1,680.00
/MND	Mileage ND Service truck daily mileage 1-15 Unit 117	EACH	90.000	0.000	0.000	1.0000	90.00
/PNMND	Parts- Non Mercer ND Taylor Spring 05-001315 G SR 61-110 PSI PSV# 4011A 4011B 4011C 4011D	EACH	4.000	0.000	0.000	107.1600	428.64
/PNMND	Parts- Non Mercer ND Gasket Kit PN#4KG26A1 PSV#3070	EACH	1.000	0.000	0.000	214.3000	214.30
/PNMND	Parts- Non Mercer ND Viton Oring Kit PN#25429-169 PSV#3070	EACH	1.000	0.000	0.000	42.8400	42.84
/FND	EXpedite - North Dakota ND0626 RMOW Shipping charges						13.18
/FND	EXpedite - North Dakota ND0627 Furmanite Shipping Charges Location Hay Butte Gas Plant						18.34



Sales Order

Form Number:1

73-1226246
 Mercer Valve Company, Inc.
 9609 NW 4TH ST
 OKLAHOMA CITY, OK 73127-2962
 (405) 470-5200

Order Number: **00EC948**
 Order Date: 1/15/2018
 Ship Date: 1/15/2018
 Customer Number: 0059650
 Order Taken By: NLarsen
 Data Entry Location: Williston ND
 Location Credit: North Dakota
 Ship From Location: Williston ND

Sold To:
 Caliber Midstream Partners
 1200 17TH ST
 Suite 2100
 Denver, CO 80202-5835
 United States

Ship To:
 Caliber Midstream
 13811 24TH ST NW
 ALEXANDER, ND 58831-8001
 United States

Confirm To:
 Brian Videtich

RC: Project #:

Customer P.O. Ship VIA COLLECT A/C # SHIP WITH S/O # Terms
 FIELD WORK 1% -15 Days or Net 30

Item Number	Alias Number	Unit	Ordered	Shipped	Back Order	Price	Amount
-------------	--------------	------	---------	---------	------------	-------	--------

12-24-18 Drove to the Alexander oil facility, tested 8 PSV's there, all PSV's passed. Then drove to hay butte gas plant, tested 3051A and 3051B, We had to order parts for PSV 4011A, 4011B, 4011C, 4011D and PSV 3070. Then drove back to Williston. 1-15-18 Drove to location and repaired PSV 3070 and then changed the spring in PSV 4011A, 4011B, 4011C, 4011D, then drove back to Williston.

SN#031900-5/WR7968F, SN#13-195179/WR3315F, SN#13-195181/WR3314F,
 SN#13-195189/WR7965F, SN#13-195181/WR7964F, SN#13-195178/WR7963F,
 SN#13-195174/WR7967F, SN#13-195177/WR7966F, SN#V13-176849/WR7969F,
 SN#026649-2/WR2914F, SN#026649-4/WR2915F, SN#026649-3/WR2913F,
 SN#026649-1/WR2916F, SN#632097-1-A101B/WR2827F, SN#627510-1-DA/WR2835F,
 SN#627510-2-DA/WR2841F

Check List: Initial Each
 Freight Collect _____
 COD _____
 Sales Tax _____
 Price _____ Form # 1

Pre-Authorization Amount by CC:0.00

Net Order: 3,697.30
 Less Discount: 0.00
 Freight: 0.00
 Sales Tax: 0.00
 Order Total: 3,697.30

Issued: 1/16/2018 10:31:33AM

MERCER VALVE CO., INC.

VALVE REPAIR TICKET

Customer: Caliber Midstream PSV# 3070 Repair S/N WR 2827 F
 Location: Hay butte Gas Plant MAWP PSI@ _____ F° Date 12-24-17
 Equipment: Residue Filter/Coalescer Filter P & ID _____

PERFORMED BY:
INITIAL & DATE

RECORD ORIGINAL NAMEPLATE:

MANUFACTURER Farris PART NO./TYPE/MODEL 26 DC13-120
 PILOT- MODULATING/SNAP PILOT P/N _____ ORIFICE 1
 SERIAL NO. 632097-1-A10/R SIZE 1 (x) 2 FLANGE RATE 600 (x) 150
 SET PRESSURE 1440 CAPACITY 3770 SCFM/GPM THRD RTJ RF
 CDTP X BP X TEMP X DATE 2013 BALANCED/LIFTLEVER / CLOSED
 CODE STAMPING: UV ✓ V _____ NB ✓ OTHER _____ CODE CASE# X
 Original Manufactures Tag Missing ✓ Duplicate Tag-Company ✓ Sec. VIII ✓

EH

12-24-17

PREVIOUS REPAIR TAG DATA:

COMPANY _____ TYPE/MODEL _____
 SET PRESSURE _____ CAPACITY _____ SCFM/GPM B.P. _____ CDTP _____
 VR: YES X NO _____ DATE _____ S/N _____

PREVIOUS TEST TAG DATA:

COMPANY Mercer TYPE/MODEL _____
 SET PRESSURE 1440 CAPACITY _____ SCFM/GPM B.P. _____ CDTP _____
 DATE _____ S/N WR2827F

CUSTOMER INSTRUCTIONS:

WORK TO BE PERFORMED: TEST FIRST / REPAIR / RESET ONLY / TEST ONLY
 WARRANTY INSPECTION R.A.# X
 SPECIAL INSTRUCTIONS: TEST FIRST, REPAIR IF NEEDED Parts ordered
 CONVERSION: YES / NO DESCRIPTION: X
 DESIRED SET PRESSURE: 1440 psi TEMP CHANGE X B.P. X CDTP X
 COMMENTS _____

INITIAL INSPECTION:

SEALS ✓ YES NO INLET ✓ OUTLET ✓ BODY ✓ BONNET ✓

PRE-TEST:

AS FOUND FIRST POP _____ SECOND POP _____ BACK PR. TEST X
 SET PRESSURE ADJUSTED YES _____ NO ✓ FINAL SET PRESSURE 1440
 LEAK TEST PASS _____ FAIL ✓

DISASSEMBLY:

MEASURED SETTINGS - ADJ. SCREW X ADJ. RING X OTHER X

CLEANING:

OPERATIONS - BLASTED _____ SOLVENT WASHED _____ POLISHED _____ RE-COATED _____ OTHER

CRITICAL INSPECTION:

MATERIAL CHECK: BODY (CS) BONNET/YOKE (CS) NOZZLE (SS) DISK (SS) SEAT (HARD/SOFT) O-RINGS
 SPRING IDENTIFICATION: AS RECEIVED PART NUMBER _____ CODE 1
 SPRING RANGE _____ COLOR CODE _____
 WIRE SIZE _____ ACTIVE COILS _____ I.D. _____
 SPRING IDENTIFICATION: IF REPLACED PART NUMBER _____ CODE _____
 SPRING RANGE _____ COLOR CODE _____
 WIRE SIZE _____ ACTIVE COILS _____ I.D. _____



TEAM - VANCOUVER (1437)
 11917 NE 56th Circle B
 Vancouver, WA 98682

packing slip

Ship to:
 MERCER VALVE CO INC
 117 ENERGY ST
 STE 101
 Williston, ND 58801

Bill to:
 MERCER VALVE CO INC - 1421 ONLY
 ATTN ACCOUNTS PAYABLE
 PO BOX 270970
 Oklahoma City, OK 73137

Page 1 of 1
 Date 12/22/2017
 PS number
 Sales order 1437-000329
 Project ID 1437-000419-01
 Contact Hale, William
 Customer Ref ND0627
 Delivery method UPS GROUND
 Carrier Account Number
 Tracking number

Item number	Description	Ordered Unit	Delivered	Remaining quantity
SI-00001648	Sales Unit Txt FARRIS O RING P/N 25429-169	1.00 EA	1.00 <i>OK</i>	0.00
4KG26A1	FARRIS GASKET KIT - 4KG26A1	1.00 EA	1.00 <i>OK</i>	0.00

RC 1/12/2018

Receipt: *Joseph A. Keegan*