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March 10, 2014

Byron Coy, PE
Director, PHMSA Eastern Region
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2013-1034M

Dear Mr. Coy:

This letter is Central New York Oil and Gas Corporation's ("CNYOG") response to the notice to Crestwood Midstream LLC identified by the above-referenced tracking number to address the issues identified as a result of the inspection of CNYOG's (OPID 31783) Public Awareness Program by the New York State Department of Public Service (NYS DPS) between August 27 - 31, 2012. At the time of the inspection, CNYOG was a wholly owned subsidiary of Inergy Midstream Operations, LLC, whose parent was Inergy Midstream, L.P. Further, as a result of a merger on October 7, 2013, between Inergy Midstream, L.P. (and other related Inergy entities), and Crestwood Midstream Partners LP (and other related Crestwood entities), Inergy Midstream Operations, LLC has been renamed Crestwood Midstream Operations, LLC, a wholly owned subsidiary of Crestwood Midstream Partners LP ("Crestwood").

The Public Awareness Program ("Plan") evaluated during the inspection was effective May 9, 2007. At the time of the August, 2012 inspection, a new Plan, effective July 1, 2012 covering all Inergy entities (enclosed as Attachment 1) had already been implemented. The deficiencies identified for the May 2007 Plan outlined in the Notice of Amendment had been addressed by the more recent July 2012 Plan.

As a result of the merger, Crestwood is undertaking efforts to consolidate all operating entities under a single Plan. We expect this consolidation to combine all identified best practices for pipeline facilities and their unique attributes.

The probable violations identified by the inspection of the superseded Plan are summarized below in italics, and the response from CNYOG referencing the section of the current Plan which addresses any deficiency is provided in the paragraph(s) following it.

1. 49 CFR 192.616; "... Program is inadequate because it failed to reference the API RP 1162 edition as seen in 192.7 (1st edition, December 2003)....."

Section 2.0 Program Objectives, references the 1st edition of API RP 1162.

2. 49 CFR 192.616; "...Program is inadequate in that it failed to provide guidance on how CNYOG demonstrates management support of the Public Awareness Program as required by API RP 1162, Section 2.7, Overall Program Administration. SpecificallyProgram ...does not contain a statement of management support."

Section 1.0 Management Commitment and Support of the Program, and the referenced Appendix A, provides a signed Management Statement of Support.

3. 49 CFR 192.616; "... Program is inadequate because it failed to follow the general program recommendations of API RP 1162 Section 7.1. Specifically, CNYOG's Public Awareness Program does not contain the name of the individual responsible for the program administration or information describing the resources committed for administering the program."

Section 4.0 Program Administration – Roles and Responsibilities, Table 4-1 Public Awareness Program Responsibilities, designates the Plan's administrator and contains a description of the responsibilities of various Responsible Parties. Additionally, Table 4-2 Public Awareness Program Administrators provides a list of committed regional resources, by entity.

4. 49 CFR 192.616; "... Program ... does not contain specific information describing CNYOG's facilities."

Section 3.0 Applicability, Table 3-1 Public, outlines the specific CNYOG pipeline facilities covered by the Plan.

5. 49 CFR 192.616; "...Program did not detail the process, procedures or methods it used to identify stakeholders.....and did not identify any excavators to include on its Program."

The process, procedures or methods used to identify all stakeholders is provided in Section 5.0 Stakeholder Audience. Examples of various types of stakeholders are provided in Table 5-1 Stakeholder Audience Identification. Specifically, Subsection 5.4 Excavators identifies the source of the excavator audience. Excavators were identified and mailed information in May, 2012. A list of excavator stakeholders to whom targeted materials were sent is available.

6. 49 CFR 192.616; "... Program does not adequately identify or define the buffer/area/boundary/extent of notifications used for identifying stakeholders who should be included on their contact lists... Program does not have, or document, the process / procedures / methods for identifying the buffer area distance around its facilities to notify stakeholders."

Sections 5.0 Stakeholder Audience, and its subsections, describes the process for identifying the buffer areas utilized for identification of all stakeholders.

7. 49 CFR 192.616; "... Program does not specifically include some of the required information detailing the process or procedures for identifying the methods of communication or the frequency of delivery...Program does not document the basis for determining the media types or the frequency of communications to be distributed...Program...does not provide the basis for these methods and timing intervals."

The process for determining methods of communication is detailed in Section 8.0 Message Delivery Methods. Message delivery frequency is provided in Section 7.0 Message Delivery Frequency and references Appendix B, Table B-1, Public Awareness Communication Message Type, Frequency, and Media. The process for determining the type of communications to be delivered is provided in Section 6.0 Message Content and Type.

8. 49 CFR 192.616; "... Program does not include guidance detailing the process or procedures for program evaluations as required under 192.616(c) API RP 1162, Section 8."

The process for program evaluations is provided in Section 11.0 Program Effectiveness Evaluation.

9. 49 CFR 192.616; "... Program does not include a process/procedure/method for identifying when it should be conducting the program in other languages commonly understood by a significant number of non-English speaking populations."

The method for evaluating whether the communications to stakeholder groups is delivered in another language is detailed in Section 6.0 Message Content and Type.

10. 49 CFR 192.616; "... CNYOG mailed a letter or brochure to various stakeholders which did not contain all of the specific information referenced in API RP 1162 Section 4. The CNYOG brochure does not include information such as the purpose and reliability, preventive measures, priority to protect life, construction and maintenance activities or pipeline security... CNYOG used a standard letter or brochure for the mailings which did not contain all of the content required by API RP 1162. In 2012 CNYOG contracted with a vendor to develop and distribute a new mailing brochure, which also does not contain all of the required items to be mentioned under API RP 1162."

We believe the 2012 brochure distributed by the vendor, Attachment 3, contains all the information cited in API RP 1162 Section 4, also specified in the Plan's Appendix B, Table B-1, in the column "Message Type". CNYOG will review future mailings and ensure that pipeline or system-specific and unique attribute information is included.

11. 49 CFR 192.616; "... Program does not contain the process/procedures/method for considering the implementation of program enhancements..."

Section 10.0 Program Enhancement outlines potential enhancements. This section references API RP 1162 and gives examples of enhancements in Appendix B, Public Awareness Communication Message Type, Frequency, and Media. The Plan's Form PA03, PA Program Enhancement Checklist (Attachment 2), guides the identification of enhancement opportunities.

12. 49 CFR 192.616; "... Program ... does not include any process/procedure/methods for its interactions with emergency responders, including determining responder expectations or the adequacy of responder resources."

Appendix B, Table B-1 Public Awareness Communication – Message Type, Frequency, and Media states that acceptable means of notification for Emergency Officials includes targeted mailings, personal contact, or group meetings. Liaison meetings are held with emergency responders to share information about emergency response capabilities and resources. The emergency responders are invited to a meeting where responder expectations are discussed and the adequacy of responder resources is surveyed. Emergency responders who did not attend the meeting received a supplemental mailing after the meeting which included the program and information to guide emergency response. Additionally, other information is distributed, including specific information on CNYOG operations, information about natural gas properties, emergency response agency capabilities survey, and instructions to access online training where additional information and training could be obtained. The survey provided to all meeting attendees and mailed to non-attendees gathered information on emergency responder resources

13. 49 CFR 192.616; "... Program does not contain specific guidance for implementing any part of the annual evaluations including the four year effectiveness evaluation or the requirements for documentation of these reviews."

Specifics for conducting the annual evaluation and the four-year effectiveness evaluation are provided in the Section 11.0 Program Effectiveness Evaluation, and its subsections, and Form PA04 guides this process.

14. 49 CFR 192.616; "... Program did not include the process or procedures for measuring the effectiveness of the program and did not meet any of the requirements for any of [sic] part

of the evaluation review including the four year effectiveness evaluation or the requirements for documentation of these reviews...Program does not contain the specifics for implementing any part of the evaluation review including the four year effectiveness evaluation or the requirements for documentation of these reviews."

Details on effectiveness evaluations and the four-year effectiveness evaluation are provided in Section 11.0 Program Effectiveness Evaluation, and its subsections. Form PA04 is also used in this evaluation.

CNYOG has presented, above, information demonstrating that the 2012 Plan, currently in effect, addresses all deficiencies identified during the inspection. CNYOG is committed to operating and maintaining its facilities and pipelines in accordance with applicable pipeline safety regulations, providing safe transportation of natural gas by its pipelines, and continuing to provide public awareness concerning our pipeline facilities. We appreciate your careful consideration of the information presented herein, and we look forward to working with the NYSDPS and PHMSA toward continuous improvement of public awareness and stakeholder communication. We appreciate the spirit of cooperation that exists between the NYSDPS, PHMSA and the regulated community; and look forward to working together to safely meet America's energy needs.

If you have any questions or need further information, please contact me at (817) 339-5544 or via email at mnorton@CrestwoodLP.com.

Respectfully,



Matthew Norton
Director, PSM and Pipeline Compliance

cc: Mr. Barry Cigich
Mr. John Shaffer
Ms. Bernadette Friehe

Encl. Attachment 1 – Inergy Public Awareness Program
Attachment 2 – Public Awareness Program Forms
Attachment 3 – Program materials distributed during 2012

