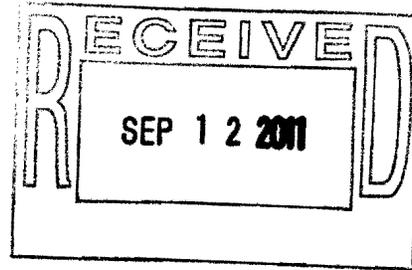


September 6, 2011



Mr. R.M Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 S Geesner Road  
Suite 1110  
Houston, TX 77074

RE: Response to CPF 4-2011-5011M

Dear Mr. Seeley :

Please consider this letter WNR's response to CPF 4-2011-5011M from the Operator Qualification audit on February 28-March 4, 2011.

Please find attached the specific issues outline in your letter CPF 4-2011-5011M regarding NACE courses as a qualification for CT 011.

WNR fully understands and appreciates the importance of its Operator Qualification Program and will continue to work to improve the program. WNR is committed to dedicating the necessary resources to the Operator Qualification program to ensure the safety of the public, employees and the protection of the environment.

Should you have any questions or concerns regarding this letter or any other matters, please don't hesitate to contact me at 505-632-4044. We look forward to working in partnership with the Office of Pipeline Safety to ensure the continued integrity and safe operation of our pipeline system.

Sincerely,

  
Ron Copple  
Western Refining  
General Manager

--- AND ---

L ENERGY worldnet, Inc.-Written: EWN-WE-AOC Pipeline Damage (L) - 2753 36 EV

**: 011 Perform Internal Corrosion Remediation -SOC: 1 - 1**

*Description:* Remediation is a repair or mitigation activity an operator takes on a covered segment to limit or reduce the probability of an undesired event occurring or the expected consequences from the event.

*Rationale:* 195.579:(c) Removing pipe. Whenever you remove pipe from a pipeline, you must inspect the internal surface of the pipe for evidence of corrosion. If you find internal corrosion requiring corrective action under §195.585, you must investigate circumferentially and longitudinally beyond the removed pipe (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the removed pipe. 195.585(a) General corrosion. If you find pipe so generally corroded that the remaining wall thickness is less than that required for the maximum operating pressure of the pipeline, you must replace the pipe. However, you need not replace the pipe if you— (1) Reduce the maximum operating pressure commensurate with the strength of the pipe needed for serviceability based on actual remaining wall thickness; or (2) Repair the pipe by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe. (b) Localized corrosion pitting. If you find pipe that has localized corrosion pitting to a degree that leakage might result, you must replace or repair the pipe, unless you reduce the maximum operating pressure commensurate with the strength of the pipe based on actual remaining wall thickness in the pits.

*Regulatory Reference:* 192.485, 195.579 and 195.585 *Task Type:* L

*Interval:* 36

*Frequency:* 3 *Complexity:* 3 *Safety:* 2

*Scale Rationale:* *O&M Ref:*

Type	Qualification Type: Evaluation	Interval	Verifiable
L	ENERGY worldnet, Inc.-Performance: EWN-PE-Abnormal Condition - Outside the Control Room - 2360	36	EV
--- AND ---			
L	ENERGY worldnet, Inc.-Written: EWN-WE-Perform Internal Corrosion Remediation (11) - 2682	36	EV
--- AND ---			
L	ENERGY worldnet, Inc.-Written: EWN-WE-AOC Pipeline Damage (L) - 2753	36	EV
--- AND ---			
L	ENERGY worldnet, Inc.-Performance: EWN-PE-Perform Internal Corrosion Remediation (11) - 4550	36	EV
OR			
L	MEA-Written: KNT 195-1422 Internal Corrosion Remediation	36	NV
OR			
L	Appropriate NACE Training-Performance: Appropriate NACE Training	36	NV
--- AND ---			
L	ENERGY worldnet, Inc.-Written: EWN-WE-AOC Pipeline Damage (L) - 2753	36	EV

**: 012 Inspect Internal Pipe Surface -SOC: 1 - 1**

*Description:* The operator must inspect the internal surface for evidence of corrosion whenever any pipe is removed from the pipeline system. If the pipe is corroded such that the remaining wall thickness is less than minimum requirements, the operator must investigate and inspect the adjacent pipe to determine the extent of corrosion. This task is performed whenever a section of the pipeline has been removed for repairs or maintenance. The performance section provides instructions for proper inspection and documentation. Elements of this task may include: • Visual inspection of the internal surface • Measurement of wall thickness

*Rationale:* The operator must inspect the internal surface for evidence of corrosion whenever any pipe is removed from the pipeline system. If the pipe is corroded such that the remaining wall thickness is less than minimum requirements, the operator must investigate and inspect the adjacent pipe to determine the extent of corrosion. This task is performed whenever a section of the pipeline has been removed for repairs or maintenance. The performance section provides instructions for proper inspection and documentation.

*Regulatory Reference:* 49 CFR 195.579 *Task Type:* LG

*Interval:* 36