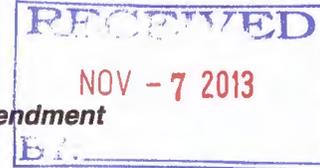


Air Products and Chemicals, Inc.
7201 Hamilton Boulevard
Allentown, PA 18195-1501
Telephone (610) 481-4911

Director, Southwest Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner, Suite 1110
Houston, TX 77074

November 6, 2013



Ref.: Request for extension for CPF 4-2013-1017M / Notice of Amendment

Attn: Mr. R. M. Seeley

Dear Mr. Seeley:

Air Products and Chemicals (APCI) has received and reviewed Notice of Amendment CPF 4-2013-1017M, dated October 15, 2013 that identifies three (3) inadequacies within APCI's O&M procedure 34-0028 (Pipeline Corrosion Control Procedure). Page 3 of the notice proposes that APCI submit the amended procedure to your office within 30 days of receipt of the notice. The document included with the notice "Response Options for Pipeline Operators in Compliance Proceedings" indicates a timeframe of 30 days to submit plans to address the inadequacies.

APCI is not contesting the findings and intends to fully comply with the regulations related to the stated inadequacies, and has already started to do so.

The purpose of this letter is to request additional time to provide the actual revised procedure. The reason for the request for extension is that this procedure is an extensive one and in order to effectively integrate the changes and process them through the APCI Management of Change system will require additional time. Therefore, APCI is requesting that only a corrective action plan be provided by November 23, 2013 (within 30 days of receipt of notice as provided for in the above referenced response guideline document) and that the actual revised procedure be provided within 60 days of acknowledgement of an extension being granted. The corrective action plan will outline the status and schedule of physical system modifications currently being made to comply with the first inadequacy, as well as address in more detail how APCI's O&M procedure 34-0028 is being modified to address the procedural aspects of all 3 inadequacies.

Please advise on acceptability of this requested extension. My contact information is below if there are any questions or concerns with this proposed corrective action submittal plan.

Sincerely,

Jody R. Arner

Air Products & Chemicals, Inc.
Global Operations / Pipeline Maint. / Proj. Engr'g.
Ph. 610-481-1707 Fax: 610-481-8790
e-mail: arnerjr@apci.com

cc: Andrew Gutacker (Gulf Coast Pipeline Manager - LaPorte TX.)
Kevin Kosh (Global Operations Pipeline Manager - Geismar, LA.)
Leticia Bailey Prevost (Pipeline Compliance Manager)
Kerry Sterner (Pipeline Maintenance Engineering)

Attachments: None