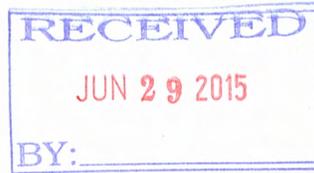


Todd Tullio
Manager
Regulatory Compliance

PHILLIPS 66 PIPELINE LLC
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Phone 832-765-1636

PHILLIPS 66
PIPELINE LLC



April 24, 2015

Rod Seeley Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner
Suite 1110
Houston, Texas 77074

RE: CPF No. 4-2015-5007W

Dear Mr. Seeley:

This letter is in response to your letter dated March 31, 2015 regarding the Warning Letter received by Phillips 66 Pipeline LLC (Phillips 66) on April 2, 2015.

By submitting this response, Phillips 66 does not waive any right, privilege or objection that it may have in any separate or subsequent proceeding related in any way to the information provided in this response.

On the basis of your inspection, PHMSA identified items within Phillips 66 plans and procedures, as described below. Phillips 66 responses to the noted warning items are below.

Item 1. §195.228 Welds and welding inspection: Standards of acceptability.

- (a) Each weld and welding must be inspected to insure compliance with the requirements of this subpart. Visual inspection must be supplemented by nondestructive testing.

PHMSA Concern:

Phillips 66 failed to visually inspect welds made during construction of the Triple C project as required by §195.228. During the PHMSA inspection, Phillips 66 was unable to produce any records or other documentation of visual inspection of the welds showing that they were found to have met the requirements of Section 9 of API 1104 and the Phillips 66 welding procedures.

Phillips 66 Response:

Phillips 66 believes it was in compliance with section 9 of API-1104 based on construction inspection oversight and NDE testing per the current welding procedure presented to PHMSA in the past. However, Phillips 66 has modified its procedure, MPR-4401 – Welding Procedures and Welder Qualifications, as requested in the NOA received April 6, 2015 (CPF 4-2015-5008M) to reflect the documentation of such examinations when welding.

Item 2. §195.214 Welding procedures.

(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under Section 5 of API Std 1104 or Section IX of the ASME Boiler and Pressure Vessel Code (ASME BPVC) (incorporated by reference, see §195.3). The quality of the test welds used to qualify the welding procedure shall be determined by destructive testing.

(b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.

PHMSA Concern:

Phillips 66 failed to confirm that welds made during construction of the Triple C project were done according to the qualified welding procedure (WPS# PID). During the PHMSA inspection, Phillips 66 was unable to produce any records or other documentation showing that the welds were confirmed to have been made according to the essential variables and within the parameters of the qualified welding procedure (i.e., within the ranges of voltage, amperage, travel speed, appropriate number of passes, and using the specified electrodes, etc.). The nondestructive examination (NDE) employed by Phillips 66 on the construction project can determine if the welders introduced a defect into the weld that would cause the weld to be rejected by the criteria in API 1104, Section 9. However, the NDE by itself cannot determine that the weld was made within the parameters of the qualified welding procedure to ensure that the weld has the same required strength and mechanical properties as the qualifying weld.

Phillips 66 Response:

Phillips 66 believes we are in compliance with §195.214 Welding procedures. Phillips 66 WQR's provide all the required steps outlined in Section 5 of API Std 1104 and Section IX of the ASME Boiler and Pressure Vessel Code, these guidelines are used when qualifying a welding procedure. These tests are documented in our welding procedures, this also includes WPS #P1D. However, Phillips 66 has modified its procedure, MPR-4401 – Welding Procedures and Welder Qualifications as requested in the NOA received April 6, 2015 (CPF 4-2015-5008M) to reflect the documentation of such examinations when welding.

Item 3. §195.202 Compliance with specifications or standards.

Each pipeline system must be constructed in accordance with comprehensive written specifications or standards that are consistent with the requirements of this part.

PHMSA Concern:

Phillips 66 failed to follow its specification, Welding Procedures and Welder Qualification, P66PL-MPR-4401 during the construction of the Triple C project. During the PHMSA inspection, Phillips 66 was unable to produce any records or other documentation showing that the welding was performed according to the requirements of P66PL-MPR-4401, Section 8, Production Welding. Paragraph 8.1.1 states, "Each weld must be thoroughly inspected to identify any defect. All defects in the root pass must be repaired before welding is resumed because defects in the root pass can propagate through the entire finished weld." Section 8 effectively details nineteen additional items associated with the root bead pass, interpass welds, and the completed weld that must be inspected. Phillips 66 could not provide any records or documentation that these welding inspections had been performed.

Phillips 66 Response:

Based on previous construction inspections performed by both PHMSA and State officials, Phillips 66 believed it was in compliance with §195.202 Compliance with specifications or standards. However, Phillips 66 has modified its procedure, MPR-4401 – Welding Procedures and Welder Qualifications, as requested in the NOA received April 6, 2015 (CPF 4-2015-5008M) to reflect the documentation of such examinations when welding.

Please let me know if you have any questions or comments regarding this matter.

Sincerely,



Todd Tullio
Manager, Regulatory Compliance

CC. Dave Barney/Phillips 66
Van Williams/Phillips 66
Todd Denton/Phillips 66
Manny Cortez/Phillips 66