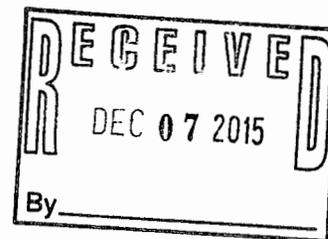


PLAINS
PIPELINE, L.P.



December 2, 2015

Via Electronic Mail and Certified Mail - Return Receipt Requested

R.M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration (PHMSA)
8701 South Gessner, Suite 1110
Houston, TX 77002

**Re: Response to Notice of Probable Violation and Proposed Compliance Order
CPF 4-2015-5025**

Dear Mr. Seeley,

This letter responds to the October 29, 2015, Notice of Probable Violation (NOPV) and Proposed Compliance Order (PCO) (CPF 4-2015-5025) issued to Plains Pipeline, L.P. (Plains) regarding certain alleged violations of the Pipeline and Hazardous Materials Safety Administration (PHMSA) Pipeline Safety Regulations. The NOPV/PCO, which Plains received on November 2, 2015, arose out of PHMSA's onsite inspection and subsequent document review of Plain's Jal, New Mexico to Wink, Texas pipeline construction project during the period April 2014 through October 2015.

The NOPV/PCO identifies two alleged violations:

- 1) "Plains performed welding on their Jal to Wink Pipeline construction without having a properly qualified welding procedure as required by § 195.214 and AP 1104 Section (incorporated by reference)."
- 2) "Plains failed to properly qualify welders that performed welding on the Jal to Wink pipeline according to the requirements of § 195.214 and AP 1104 Section (incorporated by reference)."

To clarify and confirm our prior communications regarding this matter, we note the following.

First, Plains used two welding procedures on the Jal to Wink 20-inch pipe segment: CS-F52M214 and CS-G60L203. We recognize that there has been some confusion on this point due to inconsistent communications during and following the inspection; however, we have confirmed that the information provided in our February 26, 2015 e-mail to your staff is accurate.¹ Namely, CS-F52M214 and CS-G60L203 represent the two procedures used on the Jal to Wink 20-inch pipe segment. CS-G4265L205 was not used.

¹ February 26, 2015, 3:11 p.m., e-mail from Wayne Robert (Plains) to Noah Matthews (PHMSA).

Second, we have confirmed that the welders who performed the welding on the subject line were actually qualified using X-52 pipe, not X-42. Again, we recognize and apologize for the inconsistencies in prior communications on this point. The grade of pipe used to make the qualifying welds has since been verified through material purchase receipts and other corresponding documentation enclosed as **Attachment 1**. PHMSA also confirmed the grade of pipe used for qualifying welders to X-52 during a field inspection in July of 2015 by Noah Matthews, which involved a thorough physical inspection of pipe sections used for qualification testing and material test reports (MTR) for the pipe sections.

With respect to the PCO, Plains removed Welding Procedure Specification CS-G4265L205 from its Welding Manual in January 2015. We note that the procedure was a legacy procedure to cover transition welds between X-42 and X-65 pipe. Although the procedure was never used for the Jal to Wink pipe segment, Plains commissioned testing, including destructive testing, to confirm that the welding of two joints of X-60 pipe using the procedure would produce welds that meet required strength and mechanical properties for X-60 pipe. The Procedure Qualification Record, enclosed as **Attachment 2**, confirms that any welds that might have been made with CS-G4265L205 would have met the required strength and mechanical properties for X-60 pipe.

In light of the above, Plains submits that the imposition of the NOPV/PCO as a Final Order is unwarranted and we respectfully request that it be withdrawn.

Please do not hesitate to contact me if you have any questions, or require any additional information.

Sincerely,



MEK Troy E. Valenzuela
Vice President, Environmental, Health, & Safety

By Phillip R. Smith
Vice President Operations, with Permission

ATTACHMENTS

Attachment 1

Confirmation of Qualification Using X-52 Pipe

Jordan R Janak

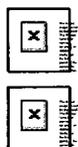
From: Wayne E Roberts
Sent: Wednesday, December 02, 2015 6:44 AM
To: Jordan R Janak
Subject: FW: [External] RE: PHMSA NOPV and Compliance Order - Welding Procedure and Welder Qualification on Jal to Wink Project
Attachments: FullSizeRender.jpg; FullSizeRender-2.jpg

From: Robert Mares [<mailto:Robert.Mares@pumpco.cc>]
Sent: Wednesday, December 02, 2015 5:54 AM
To: Wayne E Roberts
Subject: Fwd: [External] RE: PHMSA NOPV and Compliance Order - Welding Procedure and Welder Qualification on Jal to Wink Project

From: Robert Mares <Robert.Mares@pumpco.cc>
Date: November 10, 2015 at 8:24:56 AM CST
To: Jordan R Janak <JRJanak@paalp.com>, John N Haldiman <jnhaldiman@paalp.com>, Wayne E Roberts <weroberts@paalp.com>
Cc: Phillip A Higginbotham <PAHigginbotham@paalp.com>, Thomas J McLane <TJMcLane@paalp.com>, Robert W Koenig <RWKoenig@paalp.com>, Michael S Kelly <MSKelly@paalp.com>, "Tom Mureno (tmureno06@yahoo.com) (tmureno06@yahoo.com)" <tmureno06@yahoo.com>
Subject: RE: [External] RE: PHMSA NOPV and Compliance Order - Welding Procedure and Welder Qualification on Jal to Wink Project

No sir we did not have any X42 at the yard as we normally purchase X52 due to range. Most welding procedures allow a range from X42-X65 if testing with X52. Attached are the MTR'S for the pipe we purchased for the welders test. Let me know if there's anything else we can do to help.

Thanks,
Robert Mares
(979) 540-6391



Attachment 2

Procedure Qualification Record for CS-G4265L205



PLAINS
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Procedure Qualification Record No.:
CS-G4265L205

Procedure Qualification Record
Based on API 1104 20th Edition

WPS No.:	CS-G4265L205 Rev 1.	Date:	11/24/2015
Process:	SMAW	Welding Position:	5G
Welder #1:	Justin C. Hargrove	Social Security #1:	XXX-XX-7645
Welding Machine #1:	Lincoln 200 D	ID Number #1:	JH
Welder #2:	Gustavo Galindo	Social Security #2:	XXX-XX-3234
Welding Machine #2:	Lincoln 300D	ID Number #2:	GG
Test Location:	Plains Wink South Yard / Big State X-Ray	Welding Time:	35 min
Welding Machine Size:	200 / 300	Joint Design:	Single V Groove
Mean Temperature:	51°F / 73°F	Weather Conditions:	Clear and sunny
Time of Day:	AM	Wind Break Used:	N/A
Filler Metal:	E 6010, Root/E 8010, Hot Pass, Filler and Cap	Direction of Welding:	Downhill
Preheat Used:	N/A	PWHT:	None/As Welded
Pipe Material:	API 5L X60	Heat Number:	ZK3656
Pipe Outside Diameter:	20.750"	Pipe Thickness:	0.344

Electrical Characteristics

Pass	Electrode	Size, in	AWS Spec.	Current/Polarity	Weld Direction	Volts	Amps	Travel Speed, ipm
Root	E 6010 (5P)	5/32	A5.1	DC/Reverse	Downhill	23-28	135-165	10-16
Hot Pass	E 8010 (70+)	5/32	A5.5	DC/Reverse	Downhill	23-28	135-165	10-16
Filler(s)	E 8010 (70+)	3/16	A5.5	DC/Reverse	Downhill	24-28	170-195	9-14
Cap	E 8010 (70+)	3/16	A5.5	DC/Reverse	Downhill	24-30	170-200	10-14

Tensile Test

Specimen	Width, in	Thickness, in	Area, in ²	Max Load, lbs.	Tensile Strength, psi	Fracture Location	Remarks
Tensile #1	1.00	.338	.3380	29,854	88,325	Pipe Material	Acceptable
Tensile #2	1.02	.336	.3427	29,854	87,114	Pipe Material	Acceptable
Tensile #3	1.08	.338	.3650	32,450	88,904	Pipe Material	Acceptable
Tensile #4	1.08	.339	.3661	30,503	83,318	Pipe Material	Acceptable

Bend & Nick Test

Bends				Nick Breaks			
No.	Type	Results	No.	Type	Results	No.	Results
Bend #1	Face	Acceptable	Bend #5	Face	Acceptable	Nick #1	Acceptable
Bend #2	Face	Acceptable	Bend #6	Face	Acceptable	Nick #2	Acceptable
Bend #3	Root	Acceptable	Bend #7	Root	Acceptable	Nick #3	Acceptable
Bend #4	Root	Acceptable	Bend #8	Root	Acceptable	Nick #4	Acceptable

Notes

Physical witness and supervision of PQR test sample welding conducted by Joe Pacheco CPWI # 63726249

Nondestructive Testing

Visual Examination:	N/A	Report No.: N/A
Radiographic Test:	N/A	
Radiographic Test by:	N/A	
Other:		

Certification

Testing Lab: Big State X-Ray Inc	Lab Number: N/A
Tested by: Paul Dreimiller	CWI#: 14123171
Supervise by:	Date: 11-24-2015

Additional Approving Authorities

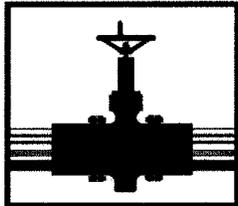
Company: Plains All American Pipeline, L.P.

Kelton S Phillips

By: *John M. Redman*



Kelton S Phillips
CWI - 63349161
OC1 EXP. 4/1/2018



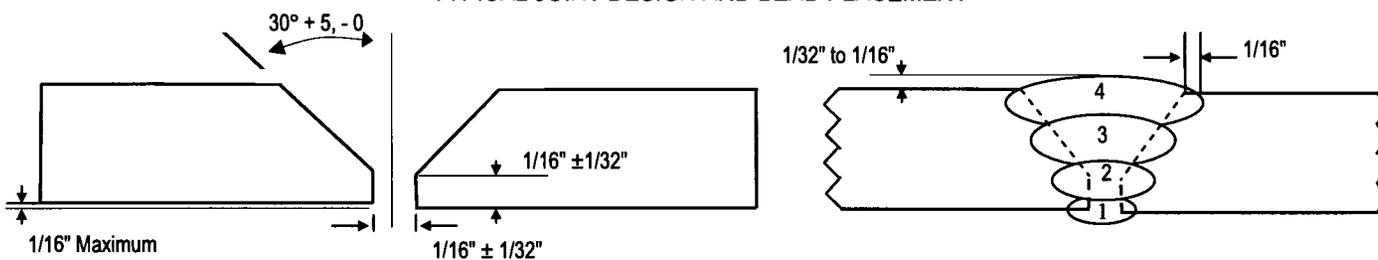
PLAINS

PIPELINE, L.P.

Procedure Specification **CS-G4265L205**
 Revision **1**
 Date **6/12/07**

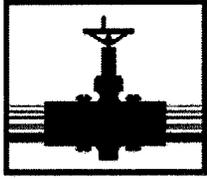
Process **SMAW** Welding of **Carbon Steel** Pipe and fittings
 Material **API 5L X42 to API 5L X65**
 Diameter and Wall Thickness **Over 12.750" O D** Nominal pipe wall thickness **.188" thru .750"**
 Joint Design **Single V Groove**
 Filler Metal and No. of Beads **E6010 / E8010-G (Gr. 1 & 2) See sketch for typical number of beads & placement. The number will vary with all thickness.**
 Electrical or Flame Characteristics **DCEP (Reverse Polarity)**
 Position **Fixed** Direction of Welding **Down**
 No. of Welders **1 or 2 (Note: 2 or more welders on diameters over 16" O D)**
 Time Lapse Between Passes **5 min maximum between completion of root bead and start of second bead**
Time between completion of second bead and start succeeding beads is 72 hours
 Type and Removal of Lineup Clamp **If internal clamp used, 100% of root bead shall be completed prior to removal. If external clamp used, 50% of root bead shall be completed prior to removal.**
 Cleaning and/or Grinding **Power brush, chip or grind to remove all surface contamination within 1/2" of weld area.**
 Preheat / Stress Relief **Preheat not required unless weld area is below 40°F then preheat to 150°F minimum.**
Maximum interpass temperature is 450°F.
 Shielding Gas and Flow Rate **N/A** Flow Rate **N/A**
 Shielding Flux **N/A**
 Plasma Gas Orifice Size **N/A** Plasma Gas Flow Rate **N/A**
 Sketches and tabulations attached **See Below** Speed of Travel **6-18 IPM**
 Tested **12/22/92** Welder **N/R**
 Approved _____ Welding Supervisor _____
 Adopted _____ Chief Engineer _____

TYPICAL JOINT DESIGN AND BEAD PLACEMENT



ELECTRODE SIZE AND NUMBER OF BEADS

Bead Number	Electrode Size	Electrode Type	Polarity	Amperage	Voltage	Travel Speed (IPM)
1	5/32"	E6010 (5P)	DCEP	130-160	22-28	10-18
2	5/32"	E8010-G (70+)	DCEP	130-160	22-28	10-18
3	3/16"	E8010-G (70+)	DCEP	160-200	23-30	6-12
4	3/16"	E8010-G (70+)	DCEP	160-200	23-30	6-12



PLAINS

PIPELINE, L.P.

Coupon Test Report

5.1

Procedure Specification

CS-G4265L205

Date

6/12/07

Date	12/22/92	Test No.	N/R
Location	N/R	WPS used	3C-TRANS
State	N/R	Process	SMAW
Welder	N/R	Weld Position	Roll <input type="checkbox"/> Fixed <input checked="" type="checkbox"/>
Welding time	N/R	Vertical	<input type="checkbox"/> Horizontal <input checked="" type="checkbox"/>
Mean temperature	58° F	Mark	N/R
Weather conditions	Good	Time of day	N/R
Voltage	22-30	Wind break used	N/R
Welding machine type	Lincoln	Amperage	130-200
Filler metal	E6010 / E8010-G	Welding machine size	SA 200
Reinforcement size	< 1/16"	Position	5G
Pipe type and grade	API 5L X42 to API 5L X65	Direction of Welding	Downhill
Outside diameter	20"	Wall thickness	.312" to .500"
Joint Design	Single "V" Groove	Backing	None

	1	2	3	4
Coupon stenciled	T1	T2	T3	T4
Original specimen dimensions (in.)	1.045 x .310	1.020 x .307	1.014 x .304	1.040 x .309
Original specimen area (in ²)	.324	.313	.308	.321
Maximum load	25,000	26,000	25,500	26,500
Tensile strength	82,260	83,070	82,700	82,550
Fracture location	Pipe	Pipe	Pipe	Pipe

<input checked="" type="checkbox"/> Procedure	<input checked="" type="checkbox"/> Qualifying test	<input checked="" type="checkbox"/> Qualified
<input type="checkbox"/> Welder	<input type="checkbox"/> Line test	<input type="checkbox"/> Disqualified
Maximum tensile 83,070	Minimum tensile 82,260	Average tensile 82,645

Remarks on tensile-strength tests **Acceptable**

1. T-1	3. T-3
2. T-2	4. T-4

Remarks on bend tests **Acceptable**

1. FB-1, FB-2	3. RB-1, RB-2
2. FB-3, FB-4	4. RB-3, RB-4

Remarks on nick-break tests **Acceptable**

1. NB-1	3. NB-3
2. NB-2	4. NB-4

Other **N/A**

Radiographic Inspection **N/A**

Test made at **N/R** Date **12/22/92**

Tested by **See signature on original document** Supervised by **See signature on original document**

We certify that the welding and testing was conducted in accordance with the requirements of API 1104, 17th edition and still meets the requirements of the 19th edition.

Additional Approving Authorities Company **PLAINS ALL AMERICAN PIPELINE, L. P.**

By _____

Date _____