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16 May 2007

Mr. Christopher Hoidal
Director, Western Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

Re: **Notice of Amendment, CPF 5-2007-5019M**

Dear Mr. Hoidal:

We received the Notice of Amendment (NOA) dated 26 April 2007 concerning the ConocoPhillips Alaska, Inc. procedures for Integrity Management and various Part 195 requirements. Although we are not contesting the NOA, we are unable to complete the required program modifications and submit the waiver request within the time allowed.

As of this date, Integrity Management Program revisions are approximately 90% complete and the petition for an atmospheric corrosion control waiver is approximately 50% complete. Work has been progressing since the actual audit in November and program revisions will be completed within the 60-day period discussed in your letter. However, another 90 days is required to adequately address the atmospheric corrosion control issue and submit a petition for waiver to the Secretary of Transportation.

ConocoPhillips Alaska Pipelines requests an extension until 30 August 2007. This extension will provide sufficient time to complete and submit a petition for waiver that supports the current approach to atmospheric corrosion control monitoring. Revised program procedures will be submitted to your office by 28 June 2007 and a copy of the petition for waiver upon completion.

We will be available to review progress or discuss our approach at any time. Please contact Sherry Timmerman at 907-263-3704 or myself if you have any questions or comments.

Sincerely,



Karen Kennedy
Operations and Engineering Manager

cc:

ALP Pipeline Coordinator	ALP 15
GKA Operations Support Supervisor	NSK 54
Integrity Management Coordinator	ATO 1102
NSK Pipeline Coordinator	NSK 22
NSOD Engineering Supervisor	ATO 848
NSOD Pipeline Operations Supervisor	NSK 22
NSK Engineering and Corrosion Supervisor	NSK 54
Barbara Fullmer	ATO 2084
Darren Jones	ATO 2100
Sherry Timmerman	ATO 902