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August 31, 2007

Mr. Chris Hoidal
Director, Western Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, #110
Lakewood, Colorado 80228

Dear Mr. Hoidal:

This is in response to the Notice of Amendment (CPF No. 5-2007-5022M) dated May 4, 2007. The Notice of Amendment (NOA) was received following an inspection of Sinclair's operator qualification procedures. The following is Sinclair's response to each item cited in the Notice:

Item 1: *Sinclair's Plan lacked a formal written process to qualify individuals from other companies performing covered tasks under mutual assistance agreements.*

Response: Sinclair modified its operator qualification (OQ) procedures to include procedures for mutual assistance agreements. Specifically, the following procedures were added to the OQ Plan:

6.5.2 Mutual Assistance

- (a) In the event that a third party performs a covered task on a SPL facility, that third party shall be qualified in accordance with an SPL approved evaluation method.
- (b) It is the responsibility of the Plan Administrator to ensure the third party qualifications are documented.
- (c) A written mutual assistance agreement shall be established with the third party. The mutual assistance agreement should state:
 - ◆ Which covered task(s) are to be performed by the third party,
 - ◆ The individuals who are to perform the covered task(s), and
 - ◆ Communication requirements so that SPL affected personnel are notified when the performance of a covered task could affect a SPL facility.

Since receipt of the NOA Sinclair has reviewed a third party's qualification methods and has qualified some third party individuals for covered tasks involved in the operation and maintenance of shared cathodic protection rectifiers. Sinclair also developed a Mutual Assistance Agreement with the third party so that when covered task are performed on the shared rectifiers, Sinclair shall be notified. This agreement has been signed by all affected personnel.

Sinclair Transportation Company

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Item 2: *Sinclair's Plan lacked a formal written process identifying the paper trail to ensure each covered task is performed by a qualified person at the time of performance.*

Response: Sinclair modified its OQ plan to identify the Sinclair document that shall be used to document each covered task performance. Sinclair has also modified some of its forms, most notably the Pipeline Maintenance Form (PLM), to include sections where covered task performance for a given time and location can be documented. The following is the amended OQ procedure:

6.5.1 Documentation of Covered Task Performance

- (a) Documentation of covered task performance is done according to the Covered Task Documentation Table in Appendix E.
- (b) All documentation shall include the name of the individual performing the covered task and the date of covered task performance.

If further information is required regarding this matter please feel free to contact me at (307-328-3643 or at jbrown@refinery.sinclairoil.com .

Sincerely,

Jonathan Brown
Regulatory Compliance Coordinator
Sinclair Transportation