

03-24-09A11:22 RCVD



Anadarko Petroleum Corporation
1201 Lake Robbins Drive
The Woodlands, TX 77380

March 16, 2009

US Department of Transportation
Pipeline and Hazardous Materials Safety Admin
12300 W. Dakota Ave.; Suite 110
Lakewood, CO 80228

RE: Proposed Compliance Order CPF 5-2009-5007

Dear Mr. Hoidal:

As a result of the Wamsutter Pipeline inspection conducted on September 24, 2008, a Proposed Compliance Order was issued in reference to CFR 195.452 (f) (1). In your letter, you wrote:

“The 2005, 2006, 2007 annual reports show that pipeline mileage designated as “could affect an HCA segment” had been reduced from 30 miles to one (1) mile without any technical justification. Based on the National Pipeline Mapping System (NPMS), it appears that the pipeline mileage that could affect an HCA segment is greater than one (1) mile on their Crude Oil Pipeline. Therefore, the HCAs were not adequately identified and located, the City of Table Rock.”

The above paragraph addresses two (2) issues regarding the mileage affecting a HCA on the Wamsutter Pipeline; 1) determine and document pipeline mileage that could affect a HCA, and 2) the inclusion/exclusion of the City of Table Rock as a HCA.

1) In regards to the reduction of mileage reported from 30 miles to one (1) mile that could impact an HCA, Anadarko Petroleum Corporation will contract with modeling specialists to conduct a Spill Impact Analysis on the Wamsutter Pipeline. This model will enable Anadarko Petroleum Corporation to:

- a) Identify which pipeline segments could affect a high consequence area (HCA)
- b) Analyze release locations and spill volumes
- c) Determine the overland spread possibilities
- d) Determine water transport of the spill

- e) Determine which pipeline segments could indirectly affect an HCA
- f) And ultimately determine total mileage of the Wamsutter Pipeline that could affect the HCAs for the annual report.

2) In regards to the City of Table Rock HCA issue, the abandoned subdivision of Table Rock was reported as an 'Other Populated Area' (OPA) to the NPMS. This subdivision has been abandoned for at least 15 years and is presently owned by Anadarko Petroleum Corporation. Since it is owned by Anadarko Petroleum Corporation, there are no allowances for population to be present related to this property. Photos of the abandoned subdivision have been provided to your office.

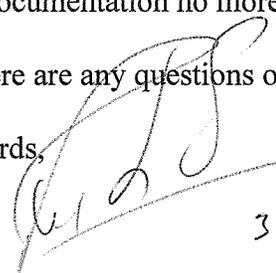
Anadarko Petroleum Corporation submits that this subdivision should not be considered an OPA. It is owned by Anadarko Petroleum Corporation, it is abandoned and the houses are being removed. Several houses have already been removed and the rest are scheduled to be removed by the end of 2009. Anadarko Petroleum Corporation would like to have the OPA distinction for the subdivision of Table Rock removed from the National Pipeline Mapping System (NPMS).

Please advise on whether or not it is necessary to include the OPA area on the Wamsutter pipeline for determining the total mileage of the Wamsutter Pipeline that could affect a HCA. Thank you for your time and consideration for the removal of the OPA distinction of the Table Rock subdivision.

Anadarko Petroleum Corporation will complete the compliance order items and submit the documentation no more than 60 days after the final order has been issued.

If there are any questions or need for further clarification, please do not hesitate to call.

Regards,



3/23/09

Rex Specht
Operations Manager Rockies Midstream
Anadarko Petroleum Corporation