



**ConocoPhillips
Pipe Line Company**

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April 15, 2009

Chris Hoidal, Director Western Region
Pipeline Hazardous Materials Safety Administration
12300 West Dakota Ave, Suite 110
Lakewood, CO 80228

RE: CPF No. 5-2009-5014M

Dear Mr. Hoidal,

This letter is in response to your letter dated March 17, 2009 regarding the Notice of Amendment (NOA), received by ConocoPhillips Pipe Line Company (CPPL) on March 23, 2009. CPPL does not wish to contest the NOA at this time.

By submitting this response, CPPL 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.

Item.1 §195.452 Pipeline integrity management in high consequence areas.

(h) What actions must an operator take to address integrity issues?

(3) Schedule for evaluation and remediation. An operator must complete remediation of a condition according to a schedule prioritizing the conditions for evaluation and remediation. If an operator cannot meet the schedule for any condition, the operator must explain the reasons why it cannot meet the schedule and how the changed schedule will not jeopardize public safety or environmental protection.

PHMSA's Position

CPPL's procedure does not ensure that in the event an anomaly condition is not repaired according to the schedule for the condition, and the operator is unable to reduce pressure, that the operator explains the reasons why it cannot meet the schedule and how the changed schedule will not jeopardize public safety or environmental protection. CPPL procedures are not in compliance with § 195.452 (h)(3).

CPPL's Response

Although historically PHMSA IMP Notifications have been made in a timely manner, CPPL recognizes the need to enhance the process identified in our Integrity Management Program (IMP) to ensure that submittal of future PHMSA Notifications for applicable derations are not missed. In order to close this gap CPPL will implement the following steps:

1) The following steps have been added to CPPL's IMP Appendix 05M, "ILI Assessment Procedure" to ensure that the proper notifications are made and validated in the future.

IMP Appendix 05M ILI Assessment Procedure:

*If the line cannot be derated, is not able to operate under a pressure deration, or the necessary deration is outside of the requirements of 195.452, a Notification to PHMSA must be made per MPR-4103 and further controls must be implemented to ensure public safety and environmental protection. The Integrity Engineer (IE) will email **(an automatic reminder has been added to ensure that a required response is sent to the initiator within 24 hours of the email)** Director of Pipeline Integrity, Manager of Asset Integrity, and Manager of Regulatory Compliance of the PHMSA notification requirement. The Director of Asset Integrity must submit a notification to PHMSA based upon information gathered in the following step.*

- Complete the required information for the PHMSA notification form. An editable copy of the form is located at: (link to PHMSA Notification Form).*
- Upon submission of the information to the PHMSA website, post a copy of the submission to EDMS under the appropriate line ID.*
- Upon notification of status from PHMSA, post a copy to EDMS under the appropriate line ID.*

2) A formal communication log to track complex deration and Notification Status will be developed to eliminate the confusion of e-mail chains by April 30, 2009.

CPPL MPR 4103 General Line and Equipment Maintenance-Derating a Pipeline to a Lower Operating Pressure: This is currently a text document outlining the process to establish pipeline derations for various anomalous conditions and operating scenarios. The document will be augmented with checklists and/or flow charts to facilitate the decision making process for IMP related pipeline derations to be completed by June 30, 2009.

The inadequacies as identified in this Notice of Amendment have been addressed in the attached revised Procedure. CPPL requests that this enforcement action be closed and for PHMSA to provide notice that this enforcement action has been closed.

Should you or anyone in your staff have any questions please call or e-mail me.

Sincerely,



Todd Tullio
Manager, Regulatory Compliance

CC. Mike Miller CPPL
Mark Drumm CPPL
Van Williams CPPL



**ConocoPhillips
Pipe Line Company**

**IMP Appendix 05M
ILI Assessment Procedure**

For
**Anomaly Assessments and Selection
Using
ILI Smart Tool's Pipeline Inspection Preliminary and Final Reports**

An Integrity Engineer's Procedure

Rev. 42 – Effective Date: 2009-04-15

Developed for

ConocoPhillips Pipe Line Company

**Document Owner:
Matthew Nimmo**

Upon Receipt of Preliminary ILI Vendor Reports

- P1) Copy (or save email as an Outlook Message Format), the Vendor information received to the S:\ drive folders including the dig sheets, where applicable.
- P2) Update BAP Database with preliminary report receipt date
- P3) Upon receipt of Vendor's preliminary report via email, determine if Immediate or Priority features are present. Once identified, apply tool tolerance to Immediate features only; do not apply tool tolerance to non-HCA anomalies. If Immediate or Priority features are identified as defined by GPL-513 and CPL-AID Supplement A, use MPR 4104 to determine the required deration pressure for the line. Work with the District Engineer (SCD), Logistics and/or Technical Service Engineer, where applicable, to determine current MOP and operating conditions of the pipeline to aid in the determination of deration pressure:
- a) Review requirements of MPR-4104 and if pressure deration calculations will take some time to perform, take a interim pressure deration as instructed in MPR-4104 otherwise:
 - b) For dent and crack categories:
 - i) Using the @web2 program and PI, determine the historical pressures at the closest monitoring points upstream and downstream of the features beginning from 60 days prior to when the ILI tool was removed from the trap to the present.
 - (1) Using the historic high pressure at the limiting monitoring point(s), set the deration pressure in accordance with MPR-4104.
 - (a) **Note: It is up to the IE to work with the Control Center and Scheduling to determine which monitoring point(s) should be used as the limiting point.**
 - (b) **Note: Use "Sampled Data" with a 5 minute interval for the PI data retrieval.**
 - (c) **Note: The controlling pressure shall be based upon the pressures at the monitoring points which are taken at the same sampling time.**
 - c) For metal loss features categories:
 - i) The deration pressure shall be in accordance with MPR-4104.
 - d) For any other features the tool vendor reports as injurious to the pipeline:
 - i) A suitable pressure reduction methodology will be used or developed in consultation with the Pipeline Integrity Manager.
- Save copies of the pressure deration calculations as working copies in the appropriate pipeline folder on S:\Transportation\Tech_Ser\Internal Inspections
- P4) Issue the Initial Pressure Deration email to the following distribution list: (See the appropriate organizational chart(s) for potential recipients)
- a) Senior Pipeline Controller – Recipient, others are on the .cc list
 - b) Manager of Engineer and Projects
 - c) Pipeline Integrity Manager
 - d) Pipeline Integrity Manager
 - e) Technical Services Engineer
 - f) Pipeline Division Manager
 - g) Major Maintenance Supervisor
 - h) Logistics Manager
 - i) Scheduling Director
 - j) Pipeline Scheduler
 - k) Controller Center Manager
 - l) Regulatory Compliance Manager
 - m) DOT Coordinator
 - n) DOT SRC Coordinator
 - o) Supervisor Engineering Services
 - p) Pipeline Integrity Analyst
 - q) Integrity Engineer Lead
 - r) Environmental Coordinator

This Initial Pressure Deration email shall be **released the same day as receipt** of the Preliminary Report email or shortly thereafter, so that the field crews can begin planning the repairs and evaluating for a Safety Related Condition (SRC). Address the SRC portion of the email to the Area Supervisor. This email becomes the Date of Discovery for these features. Save a copy of this email in *.msg format in the appropriate pipeline folder on S:\Transportation\Tech_Ser\Internal Inspection. See link below for standard email templates.

<http://livelink.conocophillips.net/livelink.exe?func=il&objId=48523956&objAction=browse&sort=name&viewType=1>

- P5) Once the pressure deration email above has been issued, contact the Major Maintenance Supervisor by phone or leave voice message. Also contact the District Engineer, if required (SCD).
- P6) If the line cannot be derated and remain in service, follow the instructions in Section F36 through F39. Once you have completed performing the steps in Section F39, return and continue with step P(8).
- P7) Update the BAP with the Preliminary Derate Date. Include a note in the comments to indicate the number of Immediate and Priority repairs identified off of the preliminary report.
- P8) Develop the ILI Integrity Work List and associated dig sheets, if applicable (developed by hand from vendor's dig sheets) for Immediate and/or Priority Features. For crack-like anomalies, request from the tool vendor a listing of any other anomalies on the same joint for use as verification/correlation anomalies. Correlate vendor dig sheets to HCA location in order to assign the correct priority code (use the data in PnTUtility to determine the could-affect HCA list). For non-HCA anomalies, do NOT add tool tolerance when classifying the anomalies; only add tool tolerance to anomalies located in HCAs. Use the official manual template copy of the "ILI Integrity Worklist" (located at C:\Apps\Data\cplaid\HelpFiles\). Save the completed worklist in the appropriate pipeline inspection file on the S:\transportation\tech_ser\Internal Inspections drive.
- P9) Issue a transmittal of "Immediate/Priority Features – Preliminary Report" approved by the Pipeline Integrity Manager. **If no Immediate or Priority features are present, also issue transmittal as such, for documentation.** Use the report template and Access Database located at S:\Transportation\tech_ser\Internal Inspections\0 Forms\Transmittal Templates to develop the Transmittal Report.
- P10) Move the following documents to the appropriate EDMS workspace:
Note 1: The following is a list of the documents associated with ILI inspections that should be stored in EDMS as part of the Preliminary Reporting. Working copies of all of these documents should be located in the applicable tool run file on s:\Transportation\tech_ser\Internal Inspections. The names below are intended to be standard naming conventions to be used within the EDMS file structure.
- a) Set up new folder using the year of the ILI run and the type of ILI tool (ie 2006 MFL; 2006 Caliper; 2006 Combo, etc.) Into this folder, copy:
 - (1) Transmittal Letters
 - (2) ILI Integrity Worklist (if applicable)
 - (3) Dig Sheets (if applicable)
 - (4) Pressure deration emails (if applicable) (Store emails using Outlook Message Format (*.msg))
 - (5) Pressure deration calculations (if applicable)

Note 2: From time to time, single Transmittals may be made for multiple runs in the same segment (ie., MFL and Caliper tools run separately). In those cases, the EDMS location for the MFL run should contain the transmittal documents. The folder for the other technology, i.e. the caliper run, should contain shortcuts to link to the documents in the MFL run folder. The shortcuts should be named as follows:

Combined Transmittal Letters

Combined ILI Integrity Worklists
Combined Dig Sheets

The existing folder names can remain unchanged.

Note 3: After the above files have been moved to EDMS, delete the working copies from the S:\ drive

P11) Use the standard email transmittal template located at [ILI Report Template](#) to transmit the report by email.

- a) Distribute the Transmittal email with a link to the documents stored on the EDMS file location as follows:
 - i) Region Manager – Recipient, others are on the .cc list
 - ii) Major Maintenance Supervisor
 - (1) All subordinates down to and including the individuals responsible for making repairs.
 - iii) Regulatory Manager (as necessary)
 - iv) DOT Coordinator (as necessary) **(for California projects, include coordinator anytime that an ILI Worklist is issued so that the CSFM can be informed)**
 - v) DOT SRC Coordinator (If Immediate or Priority Features are on worklist)
 - vi) Environmental Coordinator (If worklist is to be issued)
 - vii) Corrosion Control SME (If Worklist is issued)
 - viii) Corrosion Engineer of appropriate area (If Worklist is issued)
 - ix) Corrosion Team Leads of appropriate area (If worklist is to be issued)
 - x) Pipeline Integrity Analyst
- b) Retain original documents listed in P10)) above in PIR files

P12) Issuance of the transmittal letter will be the trigger for the Integrity Engineer to do the following tasks from the documents placed in the IE folder or on EDMS for the applicable tool run:

- a) Update BAP Database as follows:
 - i) From the "BAP Segment Data Entry" Form:
 - (1) Review Baseline Assessment (BA) Completed Date field. If empty update with baseline assessment completion date.
 - (a) If BA consists of one ILI tool run, date is completion date of tool run.
 - (b) If BA consists of more than one tool run, and time separation is less than 30 days, date is completion data of last tool run.
 - (c) If BA consists of more than one tool run, and time separation is greater than 30 days, date is completion of first tool run.
 - ii) From the "BAP Assessment Data Entry" Form:
 - (1) Run dates
 - (2) Preliminary report receipt date
 - (3) Preliminary transmittal date
 - (4) Preliminary pressure deration date, if applicable

P13) Add features to the Anomaly Counting Database (ACD) using the ACD Load procedure located in the back of this procedure.

P14) If Immediate and/or Priority features are identified and you have not done so already, contact the field Maintenance Supervisor and/or Pipeline Integrity Project Engineer to identify if the PLE group or the field maintenance group will be responsible for the repairs.

Note: If the PLE group will be responsible for the repairs, the Pipeline Integrity Project Engineer will write a work order to capture excavation and repair costs; otherwise the IE will:

- a) Request a repair cost estimate from the appropriate field personnel of that segment. If crack-like anomalies require evaluation, the field should include cost of non-destructive evaluation contractor as well as abrasive blasting pipe preparation.
- b) Using the procedures listed in Appendix 05H, prepare a Work Order for all repairs

- c) Once released, communicate the SAP WO number for repairs and/or cutouts to the individual responsible for performing the work.

P15) Update hours worked developing worklist and transmittals in the SAP work order for the specific tool run.

Preliminary ILI Vendor Reports – Follow-up on Immediate and Priority Feature

- P16) Upon receipt from the field, the Pipeline Integrity Analyst (IA) loads the ILI worklist to [S:\Transportation\tech_ser\Internal Inspections\0 ILI Worklist Review](#). The IE will review the worklist within one week after it is posted to the S:drive, following the steps outlined in **the ILI Worklist Review Procedure** in the back of this appendix.
- P17) Once a deration is in effect, the Integrity Analyst will monitor the length of time the deration has been in place. If the deration is still in effect after 60 days, the Integrity Analyst will monitor the Administrative Controls deadline as listed in **the Administrative Controls Extension Procedure** in the back of this appendix.
- P18) After written notification of completion of all Immediate and/or Priority repairs, issue rescinded deration email.
- P19) Update BAP with rescinded deration email date
- P20) Update EDMS with rescinded deration email.
- P21) Each time a worklist is returned with new completions, the IE will review it for compliance with API 1163 as outlined in **the API 1163 Compliance Review Procedure** located in the back of this appendix.