



**ConocoPhillips
Pipe Line Company**

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July 12, 2011
Mr. Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, CO 80228-2585

Re: CPF No. 5-2011-5009M
Response of ConocoPhillips Pipe Line Company
Notice of Amendment

Dear Mr. Hoidal

This letter constitutes the response of ConocoPhillips Pipe Line Company (CPPL) to the Notice of Amendment (NOA) associated with the Operations and Maintenance (O&M) procedure audit performed in the state of Colorado during August 2nd through 6th, August 9th through 13th, and September 13th through 15th of 2010. The NOA was received on June 22, 2011.

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.

CPPL submits, by this response, that these 2 items have been addressed. Attached are the procedures that CPPL has that explain how CPPL addressed the inadequacies that were found during the inspection.

Response of ConocoPhillips Pipe Line Company to U.S. Department of Transportation Notice of Amendment dated June 15, 2011 regarding CPPL's Operations and Maintenance procedural audit performed in Colorado.

1. *§195.402 Procedural manual for operations, maintenance, and emergencies.*
 - (c) *Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:*
 - (4) *Determining which pipeline facilities are located in areas that would require an immediate response by the operator to prevent hazards to the public if the facilities failed or malfunctioned.*

PHMSA Response:

At the time of the inspection, ConocoPhillips O&M manual did not include the prescriptive requirements of Part 195.402(c)(4). CPPL is required to establish a written procedure to address the requirement of Part 195.402(c)(4), including the determination which pipeline facilities are located in areas that would require an immediate response by the operator to prevent hazards to the public if the facilities failure or malfunctioned. A significant portion of this pipeline system traverses residential and commercial High Consequence Areas (HCA's) that are not addressed in their O&M manual as needing an immediate response by CPPL.

CPPL's Response:

It is CPPL's intent to always respond to an incident however, a higher level of awareness is expected for immediate areas typically associated with High Consequence Areas (HCAs). CPPL utilizes MPR- 3006 Critical Areas, as the guideline for which areas require an immediate response in case of an emergency. I have highlighted the areas and the procedure where this can be found.

Attachments provided for item 1:

MPR-3006 Critical Areas.

2. §195.442 Damage Prevention Program
 - (c) The damage prevention program required by paragraph (a) of this section must, at a minimum:
 - (2) Provides for notification of the public in the vicinity of the pipeline and actual notification of persons identified in paragraph (c)(1) of this section of the following as often as needed to make them aware of the damage prevention program:
 - (i) The program's existence and purpose; and
 - (ii) How to learn the location of underground pipelines before excavation ' activities are begun.

PHMSA Response:

At the time of the inspection, ConocoPhillips' O&M manual did not include the prescriptive requirements to provide notifications of persons identified in paragraph(c)(1) of the program's existence and purpose, and how to learn the location of underground pipelines before commencing excavation activities. CPPL is required to establish a written procedure to address the requirement of Part 195.442(c)(2).

CPPL's Response:

MPR-2304 is our public awareness program document that was approved by PHMSA in 2005. In the attached procedure, it contains information about how CPPL handles excavator notifications. I have highlighted the areas that address the inadequacies that were identified in the NOA.

Attachments provided for item 2:

MPR-2304 Public Awareness Program

The attachments that have been attached in this response have addressed the NOA and the inadequacies that were found during the inspection. Should you or your staff have any questions please feel free to call me at (832) 379-6255

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Tullio". The signature is written in a cursive style with a large, looping flourish at the end.

Todd Tullio

Manager, Regulatory Compliance