



**ConocoPhillips  
Pipe Line Company**

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April 14, 2011

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

SENT TO COMPLIANCE REGISTRY  
 Hardcopy  Electronically   
 # of Copies 1 / Date 4.18.11

**Re: CPF No. 5-2011-5010M**  
 Response of ConocoPhillips Pipe Line Company  
 To Notice of Amendment

Dear Mr. Hoidal:

This letter constitutes the response of ConocoPhillips Pipe Line Company (CPPL) to the March 10, 2011 Notice of Amendment (NOA) regarding an inspection of CPPL's operations and maintenance procedures conducted in Billings, Montana, on October 4<sup>th</sup> - 8<sup>th</sup>. The NOA was received by CPPL on March 16, 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 will not be contesting the Notice of Amendment and submits, by response that these 3 issues have been addressed through amendment and resolved with the additional information that is attached in this response.

**Response of ConocoPhillips Pipe Line Company to U.S. Department of Transportation Notice of Amendment dated March 10, 2011 regarding CPPL's operations and maintenance procedures.**

1. *§ 195.402 Procedure 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:**

*CPPL's Pipeline and Terminal Notifications process for determining areas that require immediate response was inadequate. At the time of inspection, the Pipeline and Terminal Notification written process was provided to PHMSA in the form of a flowchart which was the basis for CPPL's determination for area requiring immediate response. The flowchart instructs personnel who discover an incident to call 911; however, there are no instructions for determining under what circumstances a call to 911 would be required or where to direct responders.*

**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. The notification tree that was provided to the inspector is another tool that is used to get the right personnel involved to help the field personnel in determining what areas to respond to and what additional resources will be needed for an event. This process is started immediately upon receiving the phone call into the Bartlesville Control Center. The notification tree along with the emergency response procedures identify when 911 should be used to help get support for CPPL, the notification tree provides additional guidance under the incident section as well. Additionally CPPL uses Google Earth, Delorme Street Atlas, and TranMap an internal mapping system, which provides routes and identifies HCA areas and locations based on the areas identified by PHMSA.

**Attachments provided for item 1:**

- A) MPR-3006 Critical Areas.
- B) Notification Process Flowchart.
- C) Sample copy of HCA map that show immediate response areas identified.

**2. § 195.402 Procedure 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:*

*(13) Periodically reviewing the work done by operator to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.*

**PHMSA Response:**

*CPPL's form TSD-0103 did not adequately document the periodic review of work to ensure the effectiveness of O&M procedures. CPPL's previous form MPR-2403 for*

*documenting periodic review personnel was considered adequate after it was revised to comply with CPF 5-2006-5016M. However, the new form TSD-0103, which replaced MPR-2403, only documents such periodic reviews of personnel work to determine the effectiveness of normal operation procedures as a pass/fail question. An operator must show that an in-depth review has been performed to determine the adequacy of a procedure and, if found to be inadequate, an operator must make appropriate modifications to procedures.*

**CPPL's Response:**

In 2009, CPPL went through MPR-2403 and replaced it with TSD -0103. During this time CPPL did not change the content of the procedure, but updated the field employee form used. The updated form allows CPPL to determine a field employee's knowledge on the procedures they utilize. This form change provides a one on one review process between employees and supervisors. CPPL believes that this fulfills the regulatory requirements established in 195 & 192 when performing employee knowledge verifications. CPPL changed some of the questions that had yes or no answers to pass or fail, then upon Mr. Davis request pass or fail answers were changed back to yes or no for procedure inadequacies. In 2011 CPPL also updated our process to determine the effectiveness of our procedures. This procedure provides a process for the development, revision, or deletion of our procedures. This document also establishes a review process consistent with federal and state codes and the proper way to roll-out these new and revised procedures to the field.

**Attachments provided for item 2:**

- D) Old Field Employee form used with MPR-2403
- E) New Field Employee form used with TSD-0103
- F) TSD-0001 MOC process used to determine the effectiveness of procedures.

3. *§ 195.402 Procedure 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:*

*(5) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.*

**PHMSA Response:**

*CPPL's form TSD-0103 did not document the periodic review of responses to abnormal operations to ensure the effectiveness of procedures for controlling abnormal operations. CPPL's previous periodic review of personnel form MPR-2403 was considered adequate after it was revised to comply with CPF 5-2006-5016M. However, the new for TSD-0103, which replaced MPR-2403, does not address periodically reviewing the response of*

*operator personnel to determine the effectiveness of procedures controlling abnormal operations. An operator must show that some periodic review has been performed to determine the adequacy of response to control abnormal operations, and an operator must make appropriate modifications to that abnormal operations response procedure if it is determined to be inadequate.*

**CPPL's Response:**

CPPL made additional changes to the operations form that is associated with TSD-0103 as well in 2009. The form for operations clearly talks about operator personnel controlling abnormal operations, this form may have not been shared during the inspection. I have highlighted the areas that address these items on the form.

**Attachments provided for item 3:**

G) Operations review form associated with TSD-0103

I hope the amendments to the procedures and the additional attachments that have been shared with you in this response have addressed your concerns. Should you or your staff have any questions please feel free to call me at (832) 379-6255

Sincerely,



Todd Tullio  
Manager, Regulatory Compliance

CC. G. Davis PHMSA  
D. Barney CPPL  
V. Williams CPPL