



## Chevron Pipe Line Company

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Mr. Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
12300 W, Dakota Ave., Suite 110  
Lakewood, CO 80228

### *Electronic Transmittal*

**RE: Chevron Pipe Line Company – Federal OPID No. 02731  
Warning Letter, CPF No. 5-2016-5004W**

Dear Mr. Hoidal:

On July 8, 2016, Chevron Pipe Line Company (“CPL”) (Federal OPID No. 02731) received a Warning Letter, CPF No. 5-2016-5004W (“WL”), dated July 5, 2016, from the Pipeline and Hazardous Materials Safety Administration (“PHMSA”). The WL is in response to a July 13 - 16, 2015 PHMSA inspection of records pertaining to the CPL owned and operated Rangely-to-Salt Lake Crude Pipeline System.

In the WL, PHMSA alleges that, during a December 12, 2013 In-Line Inspection verification dig of the above pipeline, CPL failed to investigate and document whether internal condition existed circumferentially and longitudinally beyond the removed pipe section. By this letter, CPL confirms that, to avoid this type of issue from re-occurring, CPL’s Field Data Collection (“FDC”) application was modified in 2015 to prevent CPL personnel from completing the exposed pipe inspection report until the internal inspection is performed and documented (see Attachment A).

It is always CPL’s intent to comply with all PHMSA and other regulatory requirements, as well as to address any known findings/deficiencies when identified by PHMSA. It is my hope that we have addressed PHMSA’s concerns regarding this issue.

Respectfully,



Attachment

*Electronic Transmittal*

cc: L.A. Shreder  
P.T Green  
S. Molloy  
G.M. Saenz  
W.E. Wied

# ATTACHMENT A

There are 2 scenarios in Field Data Collection (FDC) application that trigger Internal Pipe Condition. Valve installed and Pipe Replacements (cut outs). When Field Personnel (User) initiate these types of field data collections they must do 2 Internal Inspections, one inspecting the upstream direction and one inspecting the downstream direction of the remaining pipe as seen below.

The screenshot shows the 'Valve Installation' dialog box. The 'Select a Route:' dropdown is set to 'CAL0324' and the 'Confirm Route:' dropdown is set to 'Confirmed'. The 'Upstream' and 'Downstream' buttons are visible. The 'Add Common Data\*' button is also present. The 'Add Upstream Internal Inspection\*' and 'Add Downstream Internal Inspection\*' buttons are highlighted with a red rectangle. The 'Valve\*' section has a 'Type of Valve' input field and 'Remove', 'Add ...', and 'View ...' buttons. The 'Weld:' section has a 'Weld ID' input field and 'Remove', 'Add ...', and 'View ...' buttons. The 'Flange:' section has a 'Type' input field and 'Remove', 'Add ...', and 'View ...' buttons. The 'OK' and 'Cancel' buttons are at the bottom right.

# ATTACHMENT A

Notice the asterisks next to the titles of the form. They indicate that these sections are required fields. The user cannot successfully save the data until this section is complete. If the user does not create an entry, a pop up screen will display reminding the user to create an entry. See below:

The screenshot shows a software window titled "Valve Installation". On the left, there are two dropdown menus: "Select a Route:" with "CAL0324" selected, and "Confirm Route:" with "Confirmed" selected. Below these are three buttons: "Upstream", "Downstream", and "View Common Data". At the bottom left, there are two buttons: "Add Upstream Internal Inspection\*" (highlighted in blue) and "Add Downstream Internal Inspection\*" (with a red arrow pointing to the asterisk). On the right side, there is a "Valve\*" field with a red arrow pointing to the asterisk, a "Type of Valve" dropdown menu with "BALL" selected, and buttons for "Remove", "Add ...", and "View ...". Below that is a "Weld:" section with a "Weld ID" field and another "View ..." button. At the bottom right of the main window are "OK" and "Cancel" buttons. An "Invalid Entry" dialog box is overlaid in the center, containing an information icon, the text "The 'Add Upstream Internal Inspection\*' entry is required. Please create an entry.", and an "OK" button.

# ATTACHMENT A

Below is the Internal Pipe Condition form. This is the form in which the User records internal and external pipe condition. Also displayed are the drop downs from which the User can choose to properly record pipe condition. This form also contains required fields (\*).

The screenshot shows a software window titled "Internal Pipe Condition". The form is divided into several sections:

- Upstream Inspection:** Contains fields for "Feature Start From Upstream\*" (with a unit of "FT" and a value of "CT\æni"), "Length of Pipe Condition\*" (with a unit of "FT"), and "Measured UT Thickness:" (with a unit of "IN").
- Inspected By\*:** A text field containing "CT\æni".
- Buttons:** A button labeled "Add Photo of Bare Pipe" is located below the "Measured UT Thickness" field.
- Actual Diameter\*:** A field with a unit of "IN".
- Internal Pipe Condition\*:** A dropdown menu with a red arrow pointing to it.
- External Pipe Condition\*:** A dropdown menu highlighted with a red rounded rectangle. The list of options includes: Dent, General Corrosion, Gouge, Local Corrosion, Material Defect, No Corrosion Observed, Not Observed, and Seam Corrosion Present in Pipeline Section.
- Documents:** A table with a "Name" header and buttons for "Remove", "Add ...", and "View ...".
- Photos:** A table with a "Name" header and buttons for "Remove", "Add ...", and "View ...".
- Bottom Buttons:** "OK" and "Cancel" buttons.

# ATTACHMENT A

Internal Pipe Condition

Upstream Inspection

Feature Start From Upstream\*:  FT Inspected By\*:

Length of Pipe Condition\*:  FT

Measured UT Thickness:  IN

Actual Diameter\*:  IN **Internal Pipe Condition\*:**

- Corrosion
- Material Defect
- No Corrosion Observed

External Pipe Condition\*:

Comments:

Documents:

Name
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Photos:

Name
------

# ATTACHMENT A

If a User does not fill out all required fields a pop up screen will advise them which section of the form is missing an entry. See below:

The screenshot shows a software window titled "Internal Pipe Condition". The window contains several input fields and buttons. The "Upstream Inspection" section includes fields for "Feature Start From Upstream\*" (5.00 FT), "Inspected By\*" (CT\jeni), "Length of Pipe Condition\*" (3.00 FT), "Measured UT Thickness:" (empty), and "Actual Diameter\*" (8.000 IN). The "External Pipe Condition\*" section has a dropdown menu set to "General Corrosion". A "Comments:" text area is at the bottom. On the right, there is a "Documents:" section with a "Name" list and "Add ..." and "View ..." buttons. At the bottom right, there are "Remove", "Add ...", "View ...", "OK", and "Cancel" buttons. An "Invalid Entry" dialog box is overlaid on the form, displaying an information icon and the message: "The 'Internal Pipe Condition\*:' entry is required. Please enter a value." with an "OK" button.

# ATTACHMENT A

## **Additional Data Security**

Another form of validation and review is the Approval workflow. Every FDC that is recorded goes through a validation and approval process. The review is done by a trained CPL employee who is a subject matter expert on the FDC. Each approver has a different role and responsibility with the ability to approve the entry or return it back to the user for correction or missing documentation.

This version of FDC was deployed in mid-June 2015. The prior version of FDC did not have the software design to force the User in the field to execute an Internal Inspection whereas this version does.