



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

MAR 07 2007

901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 5, 2007

Ms. Margaret Yaege  
General Manager of Pipelines and Terminals  
ConocoPhillips Pipe Line Company  
600 N. Dairy Ashford  
Houston, TX 74079

**CPF 3-2007-5004W**

Dear Ms. Yaege:

On October 16-20, October 30 - November 3, November 13-17 and December 11-15, 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your pipeline facilities in Illinois, Kansas, Missouri, and Indiana.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

**1. §195.404 Maps and Records.**

**(c) Each operator shall maintain the following records for the periods specified;**

**(3) A record of each inspection and test required by this subpart shall be maintained for at least 2 years or until the next inspection or test is performed, whichever is longer.**

(a) ConocoPhillips failed to properly maintain the overpressure protection records for two pump stations. The "Pressure Protection Device Inspection and Test" records did not record the actual test pressure for the High Discharge Shutdown set point, nor the Control Valve set point. The inspection form's "Required Pressure Setting" column

listed 4 – 20 mA and 0-1500 #. This data is the current in amperage output range of the transducer and the associated pressure range, not the actual test pressure shut down set point. The actual test pressures were not recorded on the test records for overpressure protection for the following pump stations on the dates listed:

Syracuse Pump Station	Blue and Gold P/L	May 15, 2006 December 2, 2005 May 26, 2005
Rosebud Pump Station	Gold P/L	November 27, 2006 May 8, 2006 November 28, 2005 May 20, 2005

**2. §195.567 Which pipelines must have test leads and what must I do to install and maintain the leads?**

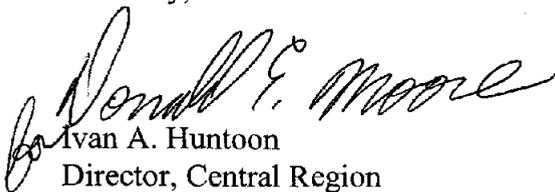
**(c) Maintenance. You must maintain the test lead wires in a condition that enables you to obtain electrical measurements to determine whether cathodic protection complies with Sec. 195.571.**

ConocoPhillips did not maintain the test lead wires on the Gold P/L at MP 183 08+50 and MP 277 06+29. The test leads were determined to be defective during the 2005 annual corrosion control survey, but their repair was overlooked during your test lead repair program in 2006 prior to the 2006 annual survey. ConocoPhillips has reported that the test leads were repaired and that cathodic protection levels were adequate.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violations persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in ConocoPhillips being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 3-2007-5004W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,



Ivan A. Huntoon  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration