



**ConocoPhillips
Pipe Line Company**

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May 5, 2010

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Mr. David Barrett
Director, Central Region
Pipeline Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

RE: CPF No. 3-2010-5005M

Dear Mr. Barrett

This letter is in response to the Notice of Amendment (NOA), received by ConocoPhillips Pipe Line Company (CPPL) on April 5, 2010.

On February 25, 2010, the Pipeline and Hazardous Materials Safety Administration (PHMSA) received a Safety Related Condition Report (SRCR) from CPPL. During PHMSA Central Region's activities following receipt of the SRCR, pursuant to Chapter 601 of 49 United States Code, CPPL's procedures were inspected for the sufficiency of pressure reduction to be taken upon discovery of immediate repair conditions, i.e., metal loss greater than 80% of normal pipe wall thickness.

The purpose of this letter is to satisfy the concerns of PHMSA related to the concerns contained in the NOA. CPPL does not request an oral hearing but submits this letter and the attached materials in response to the concerns contained in the NOA.

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. The procedures that are provided in this response shall be treated as confidential and not shared.

On the basis of the review, PHMSA has identified an apparent inadequacy found within CPPL's plans and procedures, as described below:

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

(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions

drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program:

(4) Criteria for remedial actions to address integrity issues raised by the assessment methods and information analysis (see paragraph (h) of this section);

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

(4) Special requirements for scheduling remediation

(i) Immediate repair conditions. An operator's evaluation and remediation schedule must provide for immediate repair conditions. To maintain safety, an operator must temporarily reduce the operating pressure or shut down the pipeline until the operator completes the repair of these conditions. An operator must calculate the temporary reduction in operating pressure using the formula in section 451.7 of ASME/ANSI B31.4 (incorporated by reference, see § 195.3), if applicable. If the formula is not applicable to the type of anomaly or would produce a higher operating pressure, an operator must use an alternative acceptable method to calculate a reduced operating pressure. An operator must treat the following conditions as immediate repair conditions:

(A) Metal loss greater than 80% of nominal wall regardless of dimensions.

(B) A calculation of the remaining strength of the pipe shows a predicted burst pressure less than the established maximum operating pressure at the location of the anomaly. Suitable remaining strength calculation methods include, but are not limited to, ASME/ANSI B31G ("Manual for Determining the Remaining Strength of Corroded Pipelines" (1991) or AGA Pipeline Research Committee Project PR-3-805 ("A Modified Criterion for Evaluating the Remaining Strength of Corroded Pipe" (December 1989)). These documents are incorporated by reference and are available at the addresses listed in Sec. 195.3.

(C) A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) that has any indication of metal loss, cracking or a stress riser.

(D) A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) with a depth greater than 6% of the nominal pipe diameter.

(E) An anomaly that in the judgment of the person designated by the operator to evaluate the assessment results requires immediate action.

PHMSA Review:

Of ConocoPhillips procedure CPPL – MPR-4104 “General Line and Equipment Maintenance- Derating a Pipeline to a Lower Operating Pressure” showed it to be inadequate since a reduction in actual operating pressure (or pipeline shut down) was not required by the procedure in all instances of immediate repair conditions. Specifically, the methodology in ConocoPhillips’ procedure produces a higher calculated operating pressure, and would not require a reduction in actual operating pressure in all cases or metal loss greater than 80% of nominal wall loss regardless of anomaly dimensions. Therefore, the procedure needs to be amended to include an alternative acceptable method to calculate a reduced operating pressure.

CPPL’s Response:

CPPL’s procedure for taking pressure derations on a pipeline that falls under the Integrity Management program is MPR-4104. This procedure has been reviewed numerous times by both federal and state agencies that regulate CPPL, including PHMSA, and found acceptable. This procedure clearly states, depending on the anomaly conditions (dent’s, cracks, metal loss, or other per B31.4), that CPPL will take a minimum 20% pressure reduction or a 50 psi reduction on all immediate features that were called out by the inspection tool. In the past CPPL has always taken a pressure reduction on all immediate. All priority features (NON-HCA) that are called out get the same derations described above per MPR-4104. CPPL has been able to operate its pipelines safely following this procedure without any failures or leaks during the deration process.

Going forward and after further discussions with the PHMSA’s Central Region office and CPPL’s engineering group, it was determined that CPPL must take a minimum 20% pressure reduction that is called out for all immediate features that are greater than 80%.

Attached to this response is a revised MPR-4104 that indicates the steps that CPPL will take for derating a pipeline segment going forward. I have highlighted the changes in yellow for you and your staff. CPPL submits that this NOA is completed subject to concurrence of the Central Region.

Please feel free to contact me to discuss further.

Sincerely,



Todd Tullio
Manager, Regulatory Compliance

CC: Judy Johnson/PHMSA
Mark Drumm