

October 9, 2012

Certified Mail: 7011 3500 0000 2169 0823

Mr. R.M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner
Suite 1110
Houston, TX 77074

RE: RESPONSE TO CPF NO. 4-2012-5031M

Dear Mr. Seeley:

Please consider this letter Western Refining's response to CPF No. 4-2012-5031M: Notice of Amendment dated September 13, 2012.

Please find attached the specific issues outlined in your letter CPF No. 4-2012-5031M presented in chronological order.

Western fully understands and appreciates the importance of its Control Room Management Program and will continue to work to improve the program. Western is committed to dedicating the necessary resources to the Control Room Management Program to ensure the safety of the public, employees and the protection of the environment.

Should you have any questions or concerns regarding this letter or any other matters, please don't hesitate to contact me at 505-632-8006. We look forward to working in partnership with the Pipeline and Hazardous Materials Safety Administration to ensure the continued integrity and safe operation of our pipeline system.

Sincerely,



Dave Richards
Western Refining Logistics, HS&E
Regulatory Coordinator

Cc: Mr. Leonard Bloom
Mr. Brad Ping

Attachments, amendments are highlighted:

Item 1: Western Refining (WR) procedures are inadequate as they do not specifically detail all methods of contacting supervision. Specifically, WR utilizes text messaging through a website called "iamresponding.com." Procedures are inadequate as the text messaging is not addressed in the Control Room Management plan.

- **CRM Sec. 3.4 Page 18**

Item 2: WR's procedures are inadequate as they do not address the responsibilities of the current controller and/or management to address a controller that is late in arriving. Specifically, procedures need to detail what the responsibility of the current controller is or what actions management is to do when a controller is late in arriving.

- **CRM Appendix E Page 83**

Item 3: WR's procedures are inadequate as they do not include specific procedures and practices for managing stale or unreliable data. Specifically, WR needs to update procedures to include stale alarms and to include as part of the 'pass down' process and to add to the review of safety related alarms and to include this in their instructions to be completed on the 'pass down' form.

- **CRM Sec. 5.1 Page 28**
- **CRM Appendix E Page 83**
- **CRM Pass Down Form Appendix E Page 84-85**

Item 4: WR's Alarm Management plan is inadequate as their procedures are inadequate for promptly correcting identified problems (points) and for returning these points to service. Specifically, procedures do not denote promptly correcting identified problems and for returning these points to service.

- **CRM Sec 3.3 Page 17**
- **CRM Sec 5.16 Page 34**

Item 5: WR's procedures did not specifically include other operating events in addition to those required by §195.446(g) (l). WR's procedures are inadequate as they do not include other operating events, like near misses, leaks, operational and maintenance errors.

- **CRM Sec 8.2 Pages 42-43**

Item 6: WR's training program is inadequate. The training program does not address the backup SCADA system and/or the backup control room. WR has a backup SCADA system and this is not covered in the training program.

- **CRM Sec 8.2 Page 43**
- **CRM Pages 60-61**