



**Sunoco Logistics**

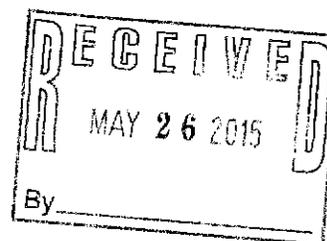


**Sunoco Pipeline L.P.**  
One Fluor Daniel Drive  
Building A, Level 3  
Sugar Land, TX 77478

May 22, 2015

**VIA: Electronic Mail and FedEx**

Mr. Rod Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
8701 South Gessner Rd.  
Suite 1110  
Houston, TX 77074



**Re: NOPV & PCP CPF No. 4-2015-5012**  
**Request for Oral Hearing**

Dear Mr. Seeley:

The Notice of Probable Violation and Proposed Civil Penalty referenced above was issued to and received by Sunoco Pipeline L.P. (SPLP) on April 27, 2015 relating to the release that occurred on the Blum to Wortham segment of the West Texas Gulf Pipeline on February 25, 2015 near Dawson, TX. The segment of the pipeline is owned by West Texas Gulf Pipeline Company and operated SPLP.

**NOPV & PCP No. 1**

SPLP does not contest the findings of NOPV and PCP No. 1 in the above referenced matter. The corresponding Civil Penalty in the amount of \$40,300 will be paid via wire transfer not later than May 27, 2015.

**NOPV & PCP No. 2**

SPLP hereby requests an in person hearing on the subject of NOPV and PCP No. 2 in the above referenced matter.

Additionally, SPLP respectfully requests that the in person hearing be scheduled subsequent to the submittal to PHMSA of the Final Root Cause Failure Analysis (RCFA) required by Item No. 4 of Corrective Action Order (CAO) CPF 4-2015-5005H which was issued to SPLP as a result of the above referenced pipeline failure on February 25, 2015. The Final RCFA is due to PHMSA not later than August 31, 2015 according to the current schedule of the required CAO actions.

SPLP intends to raise the following issue at the hearing:

The issuance of the NOPV and corresponding PCP is premature given that the RCFA required by the CAO must consider, at a minimum, the following management processes and the role they may have had in the failure:

- a. ILLI specifications and instructions to its vendors and the timing and detail of the information provided by the ILLI vendor;



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- b. Evaluation of corrosion growth rates, interaction criteria, evaluation of ILI vendor data, determination of assessment schedules, processes to confirm assumptions used in determining the assessment schedules (corrosion growth rates, tool uncertainty, correlation, etc.); and
- c. Proposed corrective actions, including revisions to our Integrity Management Plan and Pipeline Repair Procedures, as necessary, to prevent recurrence of such a failure.

SPLP contends that the contents of the NOPV as written, are directly correlated to the processes that will be subject of the RCFA, and that PHMSA should, as a matter of proper course of action, fully consider the findings of the RCFA prior to issuance of any regulatory action relating to 195.401(b)(1) General Requirements - *Non Integrity Management Repairs*. While the Final RCFA may indeed support all of or a portion of the points raised within the NOPV, it may conversely exhibit findings that mitigate all or some of the points of the NOPV, thereby reducing the scope of the NOPV and the corresponding PCP, or reducing the matter to an NOA.

SPLP reserves the right to identify additional issues that will be raised at the hearing upon further reflection and advice from counsel who will represent SPLP at the hearing. Should you have any questions or require further information please contact Todd Nardozi of our Sugar Land office at 281-637-6576 or via email at [tgnardozi@sunocologistics.com](mailto:tgnardozi@sunocologistics.com)

Sincerely,

David R. Chalson  
Sr. Vice President, Operations  
Sunoco Pipeline L.P.

Cc: Kevin Dunleavy, Leif Jensen