



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 21, 2014

Mr. H. A. "Tad" True
Vice President
Bridger Pipeline LLC
455 N Poplar St.
Casper, WY 82602

CPF 5-2014-5017W

Dear Mr. True:

During the week of May 21-25, 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your Poplar Pipeline system in the Glendive, Montana area.

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

1. **§195.402 Procedural manual for operations, maintenance, and emergencies..**
 - (a) **General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial**

operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

Bridger Pipeline staff did not follow their written procedures for conducting normal operations and maintenance activities, specifically your procedures to examine exposed pipe per §195.569. Bridger Pipeline conducted 24 In-line inspection verification digs (February 15 – March 20, 2012) on the Poplar Pipeline. All 24 digs were for external anomalies. We understand that since none of the coating was removed, the external and internal condition of the pipe's metallic surface were not noted. Nevertheless, the pipe coating was exposed and the condition of the coating and the date of the exposures were not noted on the operator's form PL-502. The operator's procedure requires completion of the exposed pipe report PL-502 when the pipe is exposed and the operator did not follow this procedure as required by §195.402(a).

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a 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 Bridger Pipeline LLC 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 5-2014-5017W**. 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,



Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 B. Brown (#138067)