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ConocoPhillips
Pipe Line Company

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April 25, 2007

Ivan A. Huntoon
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

RE: CPF 3-2007-5015M

Dear Mr. Huntoon:

This letter is in response to your letter dated March 16, 2007 regarding the Notice of Amendment, received by ConocoPhillips Pipe Line Company on March 27, 2007, issued as a result of the inspections of ConocoPhillips Pipe Line Company's pipeline systems in the Midwest in late 2006. Our response is as follows:

1(a). §195.505 Qualification Program

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a) Identify covered tasks;

(b) Ensure through evaluation that individuals performing covered tasks are qualified;

The Operator Qualification Program's evaluation forms did not provide sufficient information to evaluate an individual's performance of a covered task to ensure they were qualified. ConocoPhillips' evaluation checklist for "Field Inspection and Testing of Overfill Protective Devices On Aboveground Breakout Tanks/Vessels" did not adequately address appropriate actions to be taken for the different overfill mechanisms used.

ConocoPhillips Pipe Line Company response: The applicable ConocoPhillips procedure (MPR 6023) has been revised to more closely reflect the actions taken in the field when inspecting and maintaining overfill protection devices. In addition, the OQ evaluation checklist (BT6023.1 - Field Inspection and Testing of Overfill Protective Devices On Aboveground Breakout Tanks/Vessels) used to qualify individuals observed during these recent inspections has also been revised. The revised checklist reflects the steps set forth in the procedure.

ConocoPhillips Pipe Line Company feels that these revisions address the items set out in the "Notice Of Amendment" and will allow this item to be closed.

Sincerely,

Randy Beggs

Randy Beggs
ConocoPhillips Pipe Line Company
Director, Pipeline Regulatory Compliance

Attachments:
ConocoPhillips Pipe Line Company MPR 6023
BT6023.1 evaluation checklist

ConocoPhillips
Pipe Line Company

MPR-6023

Inspection and Testing of Overfill Protection Systems

Rev. 1 – Effective Date: 2005-08-19

Document Summary

Frequency and procedures for inspecting, testing and maintaining overfill protection systems installed on products, crude oil, liquefied petroleum gases and natural gas liquids aboveground breakout tanks with 600 or more gallons of storage capacity that were constructed or significantly altered after October 2, 2000 and other storage tanks with 1,000 or more barrels of storage capacity.

NOTE: This procedure also covers overfill protection systems installed on tanks and vessels such as sumps, truck or rail unloading storage tanks.

Official Document Location: EDMS

Document Management Information: **TPL 520** **LIF**

NOTE: The merging of heritage Company documentation into a unified set of ConocoPhillips documentation is currently underway. Until this activity is completed, a unified document may include references to heritage Company resources that have not yet been merged. Continue to utilize the referenced heritage documents until such time as a unified document, which will supersede these references, is issued. If a comparable heritage document does not currently exist for a referenced document, use the reference noted in the unified document as a guide until such time as a unified document for the reference is made available.

CAUTION: Use of this unified document or a referenced heritage Company document may require additional actions under the DOT Operator Qualification program.

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1. References

The listed documents are not by reference part of this procedure. Reference is made only to the paragraph or section listed and not the entire document.

1.1. Regulatory References

49 CFR 195.428 (d)	Transportation of Hazardous Liquids by Pipeline
NFPA 70	National Electric Code.

1.2. Industry Standards

The industry references as incorporated in these procedures are the latest version, revision, or edition except where DOT has incorporated an earlier version, revision, or edition as found in Subpart A of 49 CFR 195.3, Matter incorporated by Reference.

API RP 2350	Overfill Protection for Storage Tanks in Petroleum Facilities

1.3. Company References

TPO-4001	Atmospheric Storage Tank Level Alarm Policy
TPO-3002	Sump Level Alarm Policy

2. Background

The purpose of this document is to establish guidelines for the calibration and maintenance of overfill protection devices. It is intended to assist with the training and qualification of technicians who work with such devices.

These procedures are minimum requirements. Some situations may require additional actions to achieve an adequate margin of safety

3. Abnormal Operating Conditions

The following are the abnormal operating conditions that could be encountered while performing this procedure:

Malfunction of a pipeline component during the course of performing a covered task	• Make appropriate notifications AND • If authorized, initiate emergency shutdown/isolation of pipeline facility and/or component.
Physical damage of a pipeline facility or component	• Make appropriate notifications
Activation of an overpressure or overfill protection device	• Correct operating condition to bring pipeline facility back into normal condition • Verify that the system did not exceed 110% of MOP or tank did not overfill AND/OR • Make appropriate notifications
Leak or unintended release of hydrocarbon from a pipeline component	• Make appropriate notifications OR • If authorized, initiated emergency shutdown/isolation of the pipeline facility and/or component.

4. Prerequisites

Procedures that should be reviewed before performing this procedure:

- "Confined Space Entry", for guidelines on safely entering confined spaces.
- TPO-4001, "Level Alarm Policy For Atmospheric Storage Tanks", for time requirements for alarm levels.
- "Procedures For Control Of Hazardous Energy Sources (Lockout/Tagout/Try)", for instructions on locking and tagging out equipment.
- MPR-4017, "Safety Precautions – Protection Against Ignition Due to Static Electricity, Lightning and Stay Currents".

5. Preperation Work

Before performing this procedure do the following:

- Review the manufacturer's maintenance bulletins for the overfill protection system device being inspected.

- Notify Operations and/or Control Center of inspection, testing and maintenance activities.

6. Materials

The following may be needed for the performance of this procedure:

- Review PPE requirements per hazard assessment for the work location.
- Local inspection and trouble reporting forms.
- Manufacturer's Manuals.

7. Inspection Intervals

Overfill protection systems for HVLs shall be inspected at least twice each calendar year at intervals not exceeding seven and a half (7 1/2) months.

Overfill protection systems for non-HVLs shall be inspected per TPO-4001.

8. Inspection, Testing And Adjustment Of Overfill Protective Devices Procedure:

These steps specify the minimum requirements for this procedure. Some situations may require that additional actions be taken to achieve a satisfactory margin of safety.

CAUTION: Inspections and testing of overfill protection systems shall be conducted in accordance with API RP 2350 and as detailed in the specific manufacturer's maintenance bulletins. In general, inspection and testing should proceed as follows:

1.0 Notify operations and/or control center before conducting inspection and testing activities.

2.0 For float/displacer type devices, inspection should include the following:

Inspect switch mechanisms and contact points for moisture, corrosion and cleanliness.

If possible without entry into the tank, visually inspect the external/internal mechanism to ensure that the floats/displacers are hanging free and that the cables are not kinked.

3.0 Test High and/or High-High level overfill device alarms and/or function to local HMI/alarm panel.

NOTE: Test shall duplicate an actual High-level situation as realistically and as closely as possible.

CAUTION: Testing should, if possible, be conducted in such a manner as to not unduly impact

operations.

For float/displacer type devices, trip High and/or High-High level device manually, raise product level, or set manual gauge level above High and/or High-High level alarm trip point.

For automatic self-checking overfill devices, test can include a review of test reports or a manual initiation of a system check.

For capacitance type devices, trip High and/or High-High level device manually by placing magnetic key near explosion proof housing near the base of the tank.

Compare alarm/trip point with desired set point.

Calibrate or make adjustments if necessary.

Verify that the local HMI/control panel and/or Control Center SCADA system is receiving and displaying the alarm or shutdown.

4.0 Ensure proper operation of any flow control equipment that shuts down or diverts flow in the event of a High or High-High-level condition, if applicable.

Actuation of at least one tank High-High Level Alarm is required to confirm that all intended actions such as valve actuation occurs.

All other High-high Level Alarms shall be actuated individually to verify the alarm, then the alarm reset; however, triggering the valve actuation is not required on each tank.

Verify flow control equipment for correct operation.

Make adjustments or notify appropriate personnel if verification is not successful.

CAUTION: Testing should, if possible, be conducted in such as manner as to not unduly impact operations

5.0 Resets alarms and return device and/or controls back to normal operation.

6.0 Complete TPO-4001 Inspection and Testing Report and trouble reporting forms or provide pertinent information, as necessary, to supervisor or designee responsible for completing forms.

9. Overfill Protective Device Maintenance Procedure:

CAUTION: Maintenance of overfill protection systems should be conducted as detailed in the specific manufacturer's maintenance bulletins. In general maintenance should proceed as follows:

1.0 Notify operations and/or control center before conducting maintenance or repairs.

2.0 Maintain, repair, or troubleshoot per manufacturer's bulletins.

3.0 Verify operation of device by performing applicable steps of section 8 of this procedure.

4.0 Document maintenance and repairs on appropriate form.

10. All Other Level Switches and Alarms:

Other level switches should be visually inspected to verify that they are in good mechanical condition. Alarms should be checked for proper function.

(End of Document)

Revision/Approval Log

Revision/Approval Log			
Rev. No.	**Date**	**Action**	**By**
0	2005-08-05	Initial issuance.	Bill Shepherd, PIR
1	2005-08-19	Update to the AOC section to reflect current formatting	Bill Shepherd, PIR

ConocoPhillips Pipe Line Company

Operator Qualification Evaluation Checklist

BT6023.1 - Field Inspection and Testing of Overfill Protective Devices On Aboveground Breakout Tanks/Vessels		
Effective Date: 4/23/2007	MPR-6023 – Revision 2 – 4/23/2007 TPO-4001 – - Revision 4 – 3/6/2003	Version Number: 2.0

Employee ☐ Contractor ☐

NAME (Please Print): _____

SIGNATURE: _____ DATE: _____

TITLE or CONTRACTING COMPANY NAME: _____

ID NUMBER: _____ LOCATION: _____

☐ Initial Evaluation ☐ Reevaluation ☐ Administrative

☐ Post-Accident Evaluation ☐ Reasonable Cause Evaluation

☐ Job Performance* ☐ On-The -Job Training Performance*

*QUALIFIED INDIVIDUAL: _____

Required if neither the individual nor the evaluator is not currently qualified to perform this task and the task is being performed on a DOT jurisdictional pipeline.

☐ Task Simulation ☐ Verification of 3rd Party Certification

☐ Individual has met the evaluation criteria contained on this evaluation checklist and is, therefore, judged capable of carrying out this covered task.

☐ Individual has not met the evaluation criteria contained on this evaluation checklist. Items not marked as satisfactory on the checklist should be reviewed and practiced before a retest is scheduled.

Comments: _____

NAME (Please Print): _____

SIGNATURE: _____ DATE: _____

EVALUATOR ID: _____

ConocoPhillips Pipe Line Company

Operator Qualification Evaluation Checklist

BT6023.1 - Field Inspection and Testing of Overfill Protective Devices On Aboveground Breakout Tanks/Vessels		
Effective Date: 4/23/2007	MPR-6023 – Revision 2 – 4/23/2007 TPO-4001 – - Revision 4 – 3/8/2003	Version Number: 2.0

Individual must identify all applicable AOCs and the appropriate response for each from memory.

Description	Acceptable Response	Qualification Results
Malfunction of a pipeline component during the course of performing a covered task	▪ Make appropriate notifications *AND* ▪ If authorized, initiate emergency shutdown/isolation of pipeline facility and/or component	Satisfactory ☐ Unsatisfactory ☐
Physical damage of a pipeline facility or component	▪ Make appropriate notifications	Satisfactory ☐ Unsatisfactory ☐
Activation of an overpressure or overfill protection device	▪ Correct operating condition to bring pipeline facility back into a normal condition ▪ Verify that the system did not exceed 110% of MOP or tank did not overfill *AND/OR* ▪ Make appropriate notifications	Satisfactory ☐ Unsatisfactory ☐
Leak or unintended release of hydrocarbon from a pipeline component	▪ Make appropriate notifications *OR* ▪ If authorized, initiate emergency shutdown/isolation of pipeline facility and/or component	Satisfactory ☐ Unsatisfactory ☐

Individual should provide concise, accurate answers that demonstrate their knowledge of the principles and practices related to this covered task.

Item	Question	Critical Content for Acceptable Answer	Qualification Results
1.0	Under what testing conditions should a test of the high-high level device be made?	Testing should duplicate an actual high-high liquid level situation as realistically and as closely as possible. However, the test should not require filling the tank above its normal capacity and, if possible, should be conducted in such a manner as to not unduly impact operations.	Satisfactory ☐ Unsatisfactory ☐
2.0	Level alarm system inspection and testing should, at a minimum, consist of what activities?	▪ Visual inspection ▪ Electronic integrity testing ▪ Functional testing	Satisfactory ☐ Unsatisfactory ☐
3.0	What is the Company's policy regarding the inspection interval for overfill protection systems on tanks used to store HVLs?	Overfill protection systems on tanks used to store HVLs shall be inspected at least twice each calendar year at intervals not exceeding seven and a half (7 1/2) months.	Satisfactory ☐ Unsatisfactory ☐

BT6023.1 - Field Inspection and Testing of Overfill Protective Devices On Aboveground Breakout Tanks/Vessels

Effective Date: 4/23/2007	MPR-6023 – Revision 2 – 4/23/2007 TPO-4001 – - Revision 4 – 3/8/2003	Version Number: 2.0

Item	Question	Critical Content for Acceptable Answer	Qualification Results
4.0	What is the Company's policy regarding the inspection interval for overfill protection systems on tanks that are not used to store HVLs?	Overfill protection systems on tanks that are not used to store HVLs shall be inspected at least once a calendar year not to exceed 15 months	Satisfactory ☐ Unsatisfactory ☐

Step	Action	Qualification Results
1.0	Notify operations and/or control center of inspection and testing activities.	Satisfactory ☐ Unsatisfactory ☐ Not Applicable ☐
2.0	Inspects overfill protection device for proper operation and/or damage. ➢Inspects switch mechanisms and contact points for moisture, corrosion and cleanliness.	Satisfactory ☐ Unsatisfactory ☐ Not Applicable ☐
3.0	Tests High and/or High-High level overfill device alarms and/or function in local HMI/alarm panel. ➢Trips High and/or High-High level device manually, raises product level, or sets manual gauge level above High and/or High-High level alarm trip point for float/displacer types devices. ➢Reviews test reports or initiates a manual a system check for automatic self-checking devices. ➢Compares alarm/trip point with desired set point. ➢Calibrates or makes adjustments, if necessary. ➢Verifies that the local HMI/control panel and/or Control Center SCADA system is receiving and displaying the alarm or shutdown.	Satisfactory ☐ Unsatisfactory ☐ Not Applicable ☐
4.0	Ensures proper operation of any flow control equipment that shuts down or diverts flow in the event of a High or High-High-level condition, if applicable. ➢Actuates at least one tank High-High level alarm to confirm that all intended actions, such as valve actuation, occur. ➢Individually actuates and resets all other High-High level alarms to verify the alarm. ***NOTE:*** *Valve actuation triggering is not required on each tank.* ➢Verifies that flow control equipment is operating properly. ➢Makes adjustments or notifies appropriate personnel if verification is not successful.	Satisfactory ☐ Unsatisfactory ☐ Not Applicable ☐

BT6023.1 - Field Inspection and Testing of Overfill Protective Devices On Aboveground Breakout Tanks/Vessels		
Effective Date: 4/23/2007	MPR-6023 – Revision 2 – 4/23/2007 TPO-4001 – - Revision 4 – 3/8/2003	Version Number: 2.0

Step	Action	Qualification Results
5.0	Resets alarms and returns control to normal operation.	Satisfactory ☐ Unsatisfactory ☐ Not Applicable ☐
6.0	Completes TPO-4001 Inspection and Testing Report and trouble reporting forms or provides pertinent information, as necessary, to supervisor or designee responsible for completing forms.	Satisfactory ☐ Unsatisfactory ☐ Not Applicable ☐

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