



**ConocoPhillips
Pipe Line Company**

Todd L. Tullio
 Manager, Regulatory Compliance
 ConocoPhillips Pipe Line Company
 Threadneedle TN-5022
 600 N Dairy Ashford
 P.O. Box 2197
 Houston, TX 77079
 Phone 832-379-6255
 Fax 832-378-6410

January 9, 2012
 Mr. Chris Hoidal
 Director, Western Region
 Pipeline and Hazardous Materials Safety Administration
 12300 West Dakota Avenue, Suite 110
 Lakewood, CO 80228-2585

Re: CPF No. 5-2011-5014
 Response of ConocoPhillips Pipe Line Company
 To Notice of Probable Violation

Dear Mr. Hoidal

This letter constitutes the response of ConocoPhillips Pipe Line Company (CPPL) to the April, 6 2011 Notice of Probable Violation (NOPV) regarding an inspection of CPPL's Glacier pipeline from the Judith Gap pump station to and including facilities in Billings, Montana. On October 4 through October 8, 2010, The NOPV was received on April 11, 2011.

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.

CPPL will not be contesting the NOPV and submits, by this response, that these 4 issues have been addressed through amendment and resolved with the additional information that is attached to this response.

Response of ConocoPhillips Pipe Line Company to U.S. Department of Transportation Notice of Probable Violation dated April 6, 2011 regarding CPPL's Inspection of the Glacier pipeline and including the facilities associated with this system.

1. §195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(12) Establishing and maintaining liaison with fire, police, and other appropriate public officials to learn the responsibility and resources of each government organization that may respond to a hazardous liquid or pipeline emergency and

acquaint the officials with the operator's ability in responding to a hazardous liquid or carbon dioxide pipeline emergency and means of communication.

PHMSA Response:

ConocoPhillips Pipe Line Company's (CPPL's) liaison activities with Roundup, Montana area firefighting organizations were inadequate. CPPL's only liaison activities with Roundup firefighting organizations have been through the Montana Liquid and Gas Pipeline Association's (MLGPA) emergency responder annual meetings in Billings, Montana. Based on records provided to PHMSA, it appears that no representatives from Roundup firefighting organizations attended this meeting in 2010. The Roundup station and tank farm are located just outside of Roundup. Although the ConocoPhillips Billings refinery fire brigade would respond in the case of a fire at the Roundup station and tank farm, the response time could be more than an hour. Therefore, firefighters from Roundup appear they would be the first responders to a fire at Roundup station and tank farm. Furthermore, liaison with the Roundup firefighting organizations would lower the probability of personnel injury and property damage in the event of a fire at the Roundup station and tank farm. An operator must have adequate liaison with local fire fighting organizations that may respond to an operator's hazardous liquid emergency. These liaison activities are required to allow the operator to learn the responsibilities and resources of those local response organizations and to acquaint the emergency responders with the operator's ability to respond and to coordinate methods of communication during a hazardous liquid emergency.

CPPL's Response:

On March 17, 2011 two CPPL representatives visited the Roundup fire department and provided the information needed to address the concerns above. I have provided as an attachment to this letter the meeting minutes for your review. In addition to that meeting in 2011, CPPL developed an online secure portal that allows emergency responders access to our emergency response plans. This will allow our emergency responders on demand up to date information at all times. As well in 2011, CPPL developed an online training portal for emergency responders that can't make the annual training. The Roundup Fire Department has received notifications and has been invited to these web sites. CPPL provides annual mailings to the Roundup Fire Department, in this mailing CPPL or vender of choosing provides the required information about CPPL's pipelines and how they can see these pipeline through the National Pipeline Mapping System (NPMS). Although the Roundup Fire Department did not attend the MLGPA meeting in Billings they did receive the same information as those that attended the meeting which meets the RP-1162 requirements.

Attachment A

- Meeting minutes
- Screen shots of portals
- Emergency response brochure

2. §195.428 Overpressure safety devices and overfill protection systems

(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7~ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

PHMSA Response:

CPPL did not properly inspect and test all of their pressure limiting devices. CPPL failed to verify the buckling pins associated with the 300 psig relief valve at the Billings station and the 800 psig relief valve at the Roundup station. The inspections did not confirm the buckling pins were compatible and of the correct pressure rating for the relief valves in which they were installed. Neither buckling pin had a factory applied tag with pertinent information required to match each pin to its respective valve. CPPL personnel stated that because the pins are exposed to the elements the pin tags eventually degrade. Additionally in a March 2, 2011 email, CPPL staff stated "Replacement rupture pins come from the manufacturer with serial numbered tags attached to the pin that match the serial number of the valve. Furthermore, high and low rupture pins have different diameters and the high pressure pin will not fit in the pin holder of the low pressure pin. The pins are not interchangeable with other valves. The pins are designed with specific length and diameter and a valve must be sent to the manufacturer's representative to change pressure relief settings." Nevertheless, CPPL had no documentation to show that they had verified, during annual inspections, that these buckling pins were compatible and of the proper pressure rating for the valves in which they were installed. Buckling pins must be verified as being compatible and of the correct pressure rating for the valves in which they are installed in order for an operator to determine the overpressure safety devices are adequate from the standpoint of capacity and reliability.

CPPL's Response:

CPPL has installed the needed ID tags for the rupture pins mentioned above. Attached to this letter are pictures that show the new tags that have been installed on the rupture pins in question. I have also attached the system operating data sheet that provides the operating parameters for the systems.

Attachment B

Pictures of Rupture Pins and Tags
Copy of Operating DATA sheets

3. §195.404 Maps and Records.

(b) Each operator shall maintain for at least 3 years daily operating records that indicate

(1) The discharge pressure at each pump station; and

PHMSA Response:

CPPL failed to ensure that its pump station that transferred product through its 3.65 mile long pipeline to the ExxonMobil refinery is able to record daily discharge pressures. The CPPL ExxonMobil transfer pump station was configured such that the daily discharge pressure recording device was at the terminus of this 3.65 mile long pipeline and not at the discharge side of the pump station itself. With the recorder at the terminus of the pipeline, it does not record the discharge pressures from the pump station but instead it records the pump station discharge pressure minus pressure losses due to friction experienced over the length of the pipeline. Additionally the pressure recorder could have been isolated from the pump station should one of the valves between the transfer pump station and the end of the pipeline become closed. With the pressure recorder isolated from the actual transfer pump it would be impossible for CPPL to record pump station daily discharge pressures. An operator must have the means to record and maintain for at least 3 years the daily operating discharge pressure from each of its pump stations.

CPPL's Response:

Provided is a drawing that shows the location of the pressure recording devices located on the system. These devices are just downstream of the meters and provide the needed discharge pressure readings for the pumps at the stations. This information is logged through SCADA, I have attached 1 year of pressure recording information.

Attachment C

Drawing showing where the devices are located
1 year of pressure recording information

4. §195.440 Public awareness

(a) Each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (IBR, see § 195.3).

PHMSA Response:

CPPL failed to meet the objectives of their Public Awareness program when they did not inform each emergency official along the Glacier pipeline of their facility locations

within each emergency official's area of jurisdiction. Additionally, CPPL failed to inform each emergency official of the location of the Glacier emergency response plan for facilities within each emergency official's area of jurisdiction. CPPL's Public Awareness Program MPR-2302A communication objectives for local emergency officials includes providing emergency officials the location of CPPL pipelines and/or terminals within the emergency officials' area of jurisdiction as well as the location of each facility's associated emergency response plan.

CPPL provided PHMSA a copy of the Montana Liquid and Gas Pipelines Association's Public Awareness and Emergency Responder annual meeting PowerPoint presentation as evidence that they were meeting their Public Awareness's objectives. In that presentation, emergency responders were directed to contact pipeline operators for specific pipeline locations within their areas. This statement does not meet the objectives of the CPPL Public Awareness Program of providing local Emergency Officials the locations of CPPL pipelines and terminals and emergency response plans within the Officials area of jurisdiction. CPPL stated they had no other documentation of local emergency response official contacts. It is not the local emergency responders' responsibility to contact a pipeline operator for the location of the operator's pipelines and facilities. Instead it is the pipeline operator's responsibility to ensure emergency responders have sufficient knowledge of the pipeline system to respond to a spill or fire. An operator is required to implement their written public awareness program following the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162.

CPPL's Response:

CPPL has been sending the emergency responders mass mailers that provide information on CPPL's response capabilities and how to get additional information, which can be found on our Celeritas data base and in attachment A Emergency Responder brochure. In addition to the mass mailer and the MLPA meetings that are not mandatory to attend we have developed a secure on-line portal that will allow the emergency responder to gain access to our response guides that have been approved by PHMSA as adequate. All of the emergency responders along the Glacier pipeline have been sent the link to the website and can access when they need. I have provided a snap shot of the portal that emergency responders can review. CPPL has updated our profile sheets to include the web site for emergency responders, facility locations, and NPMS website.

Attachment D

- Snap shot of training and emergency response manual portal
- Profile sheet for Glacier Pipeline
- Copy of E-mail blast that went out to Roundup Fire Department
- Snap shot of new company website
- Journal Entry

X
Sincerely,

A handwritten signature in black ink, appearing to read "Todd Tullio". The signature is fluid and cursive, with a large loop at the end.

Todd Tullio

Manager, Regulatory Compliance