

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 14, 2011

Mr. N.C. Bowerman
Vice President of Operations
Hunt Crude Oil Supply Company
P.O. Box 211
Gilbertown, AL 36908

CPF 2-2011-5008M

Dear Mr. Bowerman:

From December 13-17, 2010, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) inspected the Hunt Crude Oil Supply Company (Hunt) written procedural manual for operations, maintenance, and emergencies at your Melvin, Alabama, pipeline office, pursuant to Chapter 601 of 49 United States Code.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Hunt's procedures, as described below:

1. § 195.214 Welding procedures.

(a) Welding must be performed by a qualified welder in accordance with welding procedures qualified under Section 5 of API 1104 or Section IX of the ASME Boiler and Pressure Vessel Code (incorporated by reference, see §195.3) . The quality of the test welds used to qualify the welding procedure shall be determined by destructive testing.

(b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.

Hunt's *Liquid Pipeline O&M Plan – August 2010, Procedure 6.10.1* was inadequate because it did not specify the correct edition and section of American Petroleum Institute (API) Standard 1104, *Welding of Pipeline and Related Facilities*, it would use to qualify welding procedures. Moreover, the procedure did not require Hunt to record the welding procedures in detail and include the results of the qualifying tests.

2. **§ 195.222 Welders: Qualification of welders.**

(a) Each welder must be qualified in accordance with section 6 of API 1104 (incorporated by reference, see § 195.3) or section IX of the ASME Boiler and Pressure Vessel Code, (incorporated by reference, see § 195.3) except that a welder qualified under an earlier edition than listed in § 195.3 may weld but may not re-qualify under that earlier edition.

Hunt's *Liquid Pipeline O&M Plan – August 2010, Procedure 6.10.1* was inadequate because it did not specify the correct edition or section of API Standard 1104 it would use to qualify welders.

3. **§ 195.571 What criteria must I use to determine the adequacy of cathodic protection?**

Cathodic protection required by this Subpart must comply with one or more of the applicable criteria and other considerations for cathodic protection contained in paragraphs 6.2 and 6.3 of NACE SP 0169 (incorporated by reference, see § 195.3).

Hunt's *Liquid Pipeline O&M Plan – August 2010, Procedure 7.9* was inadequate because it did not specify the correct edition of NACE International Standard Practice SP 0169, *Control of External Corrosion on Underground or Submerged Metallic Piping Systems*, it would use to determine the adequacy of its cathodic protection.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. 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). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Hunt maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Wayne Lemoi, Director, Southern Region, Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 2-2011-5008M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Wayne T. Lemoi
Director, Office of Pipeline Safety
PHMSA Southern Region

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*