



CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Shell Pipeline Company LP

Two Shell Plaza
P.O. Box 2648
Houston, TX 77002

December 20, 2007

U.S. Department of Transportation
Pipeline and Hazardous Material Safety
Administration
Mr. R. M. Seeley
Director, Southwest Region
8701 South Gessner Road, Suite 1110
Houston, TX 77074

SUBJECT: NOTICE OF AMENDMENT, CPF No. 4-2007-5043M

Dear Mr. Seeley,

On November 28, 2007 Shell Pipeline Company LP (SPLC) received a Notice of Amendment (NOA) from the Pipeline and Hazardous Materials Safety Administration (PHMSA), Southwest Region regarding the inspection of SPLC's Operator Qualification (OQ) program, that was conducted on September 5, 2007. While SPLC disagrees that there are inadequacies in its OQ program, we are committed to addressing PHMSA's evolving expectations. Therefore, we have updated the program documentation to address the points identified in the NOA.

Below is an explanation of how each item in the NOA was addressed. The revised pages from the program have been attached. Additionally, the directly applicable text has been highlighted, boxed and labeled.

Item 1 – See Attachment 1. Text has been added to the last bulleted item in Section 11, Management of Change, to clearly indicate that modifications to AOCs identified from incident reviews and employee/contractor feedback will be communicated to individuals performing covered tasks.

Item 2 – See Attachments 1 and 2. Text has been added to the last paragraph of Section 11, Management of Change, to reflect that SPLC will henceforth notify appropriate state agencies of significant plan changes. Also, a table of pertinent agencies has been created and designated as Table 2 in Appendix C (MOC Procedure).

At this point, I believe that SPLC has addressed all of the items in the NOA. As requested in the NOA, we are also sending an electronic version of this response via e-mail. Please contact me at 713-241-3620 if you have any questions or wish to discuss the items above further.

Sincerely,

Brian Sitterly
Manager, Integrity & Regulatory Services

Attachments