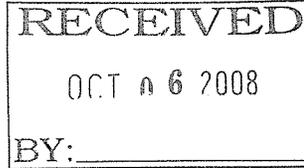




**ConocoPhillips
Pipe Line Company**



Todd L. Tullio
Director Regulatory Compliance
ConocoPhillips Pipe Line Company
1000 South Pine
Ponca City, OK 76602
Phone 580.767.4891
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September 29, 2008

Rodrick M. Seeley, Director Southwest Region
Pipeline Hazardous Materials Safety Administration
8701 S. Gessner Ste 1110
Houston, TX 77074

RE: CPF No. 4-2008-5011 2nd Update

Dear Mr. Seeley

This letter is in response to the Notice of Probable Violation (NOPV) / Proposed Compliance Order dated April 9, 2008. ConocoPhillips Pipe Line Company's (CPPL's) updates to action item 1 and 3 of this compliance order are set forth below.

Item 1. 195.412 Inspection of right-of-way and crossing under navigable waters.

(a) Each operator shall, at intervals not exceeding 3 weeks, but at least 26 times each calendar year, inspect the surface conditions on or adjacent to each pipeline right-of-way. Methods of inspection include walking, driving, flying or other appropriate mean of traversing the right-of-way.

CPPL's Response:

Regarding item 1, CPPL has completed the areas of concern that were identified during the inspection. Attached is a schedule that shows the areas that were completed with dates and cost. The enclosed disk includes photos associated with the completed work. CPPL will continue with the right-of-way program that is in place for the remaining areas on the pipeline. Based upon the completed work, CPPL submits that action item 1 is completed, subject to concurrence of the Southwest Region.

Item 3. 195.583 What must I do to monitor atmospheric corrosion control.

(c) If you find atmospheric corrosion during an inspection, you must provide protection against the corrosion as required by Sec. 195.581.

CPPL's Response:

Regarding item 3, CPPL has completed the areas of concern that were identified during the inspection. Attached is a photo taken after block valve 6 was painted. Block valve 6 was the only remaining valve that was identified during the audit that needed to be painted. CPPL will continue with the exposed piping program per MPR-6020 that is in place for the remaining areas on the pipeline. CPPL submits that action item 3 is completed, subject to concurrence of the Southwest Region.

Should you or anyone in your staff have questions please call me at 580-767-4891.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd L. Tullio". The signature is fluid and cursive, with the first name "Todd" being the most prominent.

Todd L. Tullio
Director, Regulatory Compliance

CC: Mark Drumm
Scott Nugent
Van Williams
Lewis Cresswell

