



## Plains Exploration & Production Company

February 11, 2009

Mr. Chris Hoidal, P.E.  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
12300 W. Dakota Ave, Suite 110  
Lakewood, Colorado 80228

Re: Response to Notice of Probable Violation (NOPV) and Proposed Compliance Order (PCO) – Crude Oil Pipeline from Platform Irene to the Lompoc Oil and Gas Plant (LOGP) and Crude Oil Pipeline from Platform Hermosa to the Gaviota Oil Heating Facility – DOT File No. CPF No. 5-2009-7001

Dear Mr. Hoidal,

Plains Exploration & Production Company (PXP) has reviewed the above captioned NOPV and PCO dated January 8, 2009. We are contesting the PCO as discussed below.

The NOPV stated one item of concern as follows:

**§ 195 .426 Scraper and sphere facilities.**

**No operator may use a launcher or receiver that is not equipped with relief device capable of safely relieving pressure in the barrel before insertion or removal of scrapers or spheres. The operator must use a suitable device to indicate that pressure has been relieved in the barrel or must provide means to prevent insertion or removal of scrapers or spheres if pressure has not been relieved in the barrel.**

Upon inspection of the PXP receiver in the LOGP station, it was observed that the receiver has the potential to be opened under pressure due to lack of a vent valve (to atmosphere) on the barrel and therefore does not comply with 195.426. Consideration should be also be given to installation of an equalization line and/or a valve immediately downstream of the mainline trap valve to depressurize upstream of the barrel in the event the pig gets stuck in the neck pipe.

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PXP's response to this concern is as follows:

The receiver in the LOGP station has two, two inch valves on it (one on the bottom and one on the top), as well as a three-quarter inch valve on the top (refer to R-30 on the attached P&ID). All of these are piped to the drain that is open to the atmosphere. These valves allow for safely relieving the pressure in the barrel before insertion or removal of scrapers or spheres. These valves and related piping to the drain have always been in place as part of the receiver. This system has been reviewed during multiple prior DOT Audits with no exceptions noted. It might not have been readily apparent to this inspector that these valves and piping are routed to an atmospheric system as required.

Based on this information we respectfully contest the NOPV and PCO, and object to the allegations in whole. We request that you reconsider the matter and provide us with a written reply to close this file.

During the inspection the inspector requested that we consider possibly installing an additional valve immediately downstream of the mainline trap valve to depressurize upstream of the barrel in the event the pig gets stuck in the neck pipe. After thoughtful consideration we agreed that this was a good idea, even though this is not required by regulation and this system has always been equipped with an electronic pig location indicator ("Pig Sig"). In July 2008 PXP installed a one-inch valve and gauge immediately downstream of the mainline trap valve (refer to the cloud upstream of R-30). The valve and gauge allow verification of no pressure in the neck pipe before opening the pig trap for pig removal.

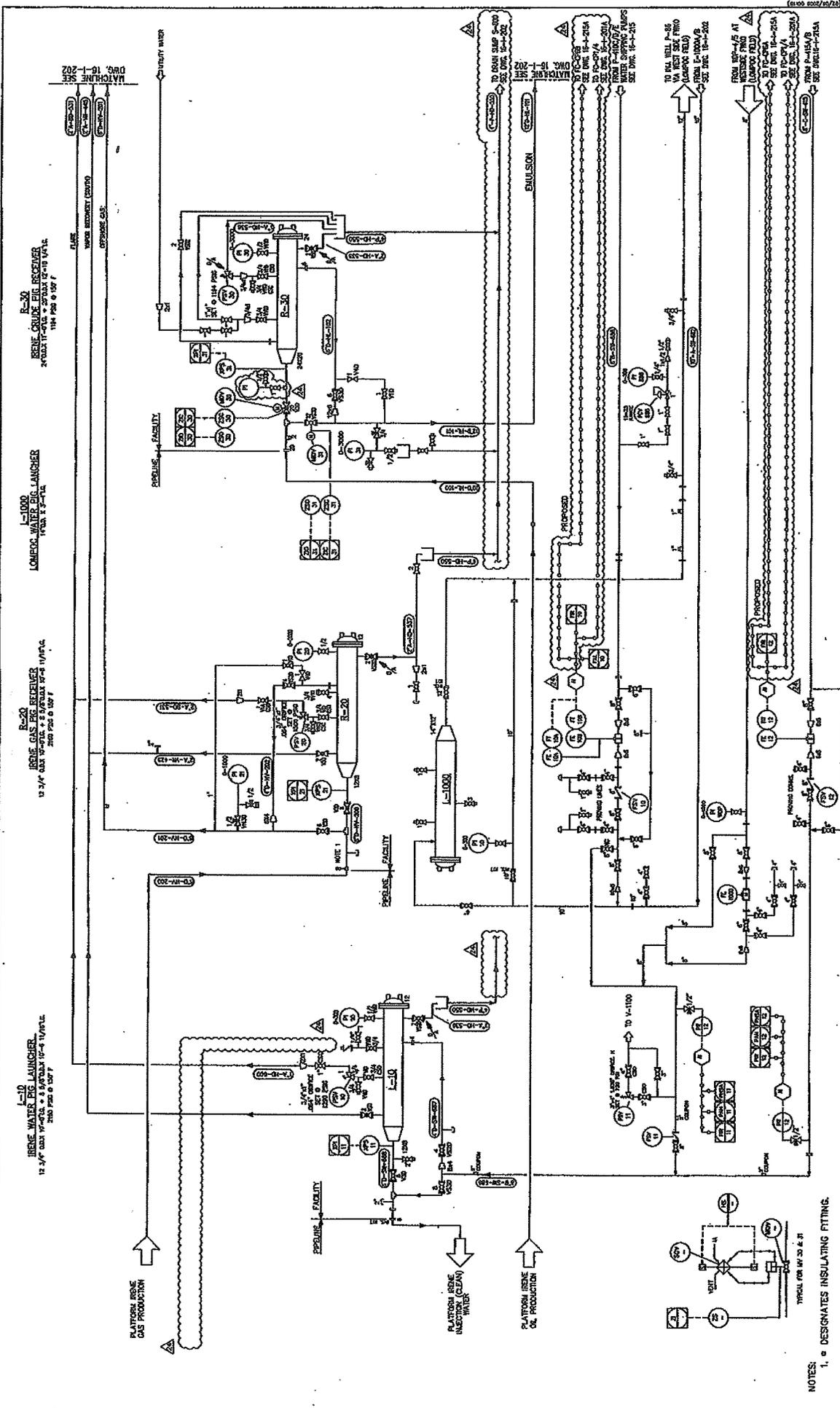
Should you have any questions, please contact Mr. Bob Marsalek at (805) 934-8223,

Sincerely,



Thomas B. Goeres  
Operations Manager

Attachment



PROCESS MECHANICAL FLOW SHEET		LAUNCHERS AND RECEIVERS		LOMP OC OIL & GAS PLANT (LOGP)		LOMP OC, CALIFORNIA	
NO.	DATE	BY	CHKD.	NO.	DATE	BY	CHKD.
1	10/2/50	J. W. B.		1	10/2/50	J. W. B.	
2	10/2/50	J. W. B.		2	10/2/50	J. W. B.	
3	10/2/50	J. W. B.		3	10/2/50	J. W. B.	
4	10/2/50	J. W. B.		4	10/2/50	J. W. B.	
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6	10/2/50	J. W. B.		6	10/2/50	J. W. B.	
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99	10/2/50	J. W. B.		99	10/2/50	J. W. B.	
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**PROCESSES UNLIMITED**  
 International, Inc.  
 DCN: 16-1-201

NOTES:  
 1. e DESIGNATES INSULATING FITTING.

MARKED PHOTOGRAPH DRAWINGS