



**OPERATIONS OFFICES**

02-29-16 14:03 RCVD

P.O. BOX 10, NEWCASTLE, WYOMING 82701  
Phone# 307-746-2379 · Fax # 307-746-3606

February 25, 2016

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

RE: WPC Notice of Proposed Safety Order (CPF #: 5-2016-6001S):

Dear Mr. Hoidal:

The letter is in response to your Notice of Proposed Safety Order (CPF #: 5-2015-6006S dated January 25, 2016. WPC did receive the CFP # correction letter and have made those corrections. Below is WPC response to the Notice of Proposed Safety Order.

Wyoming Pipeline Company (WPC) proposes to purge the pipeline segment from Buck Creek Station (Niobrara County) to Mush Creek Station. WPC plans to purge the line using foam pigs pushed with nitrogen. WPC will split this project into three (3) sections. The first section consists of the 21.1 miles of 8" line between Buck Creek Station and the 10" pig launcher located north of the Cheyenne River Rectifier. The purge oil will be pushed into frac tanks at the 10" pig launcher location. This is being done to reduce the pressure required to push the pig down the line and help prevent leakage during the process. The purge oil will be loaded on crude transports and delivered to Mush Creek Station. Once completed, the nitrogen purge operation will be moved to the 10" pig launcher. The second section consists of the 5.06 miles of 10" line between the 10" pig launcher north of the Cheyenne River Rectifier to the 8" pig launcher just north of the Cheyenne River Road. The purge oil will be pushed into Mush Creek Station tankage. The third section consists of the 19.97 miles of 8" line between the 8" pig launcher at Cheyenne River Road and Mush Creek Station. Frac tanks will be set up at Mush Creek Station to allow air/nitrogen to be separated from the crude oil before going to tankage to prevent vapors from accumulating under the floating roofs and prevent the roof from possibly submerging. WPC has contacted four (4) purging contractors and has made a decision on the contractor that will be used. There may be areas with low lying water that might be frozen under the current conditions so WPC requests that this project commences in April or June of 2016. This will allow those areas to thaw and prevent pressure issues during the project.

If you have any questions or comments concerning the above-mentioned request, please contact me at the refinery (307) 746-2379 ext. 105 between the hours of 7:30 a.m. and 4:00 p.m., Monday through Friday.

Sincerely,

A handwritten signature in black ink, appearing to read "Nelson D. Holwell", written over a horizontal line.

Nelson D. Holwell  
Pipeline Manager/ Operations Engineer