



PORTLAND PIPE LINE CORPORATION
Safety, Environment, Customer, Community

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October 29, 2013

Mr. Byron Coy, Jr. P.E.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Eastern Region, Suite 306
820 Bear Tavern Road
W. Trenton NJ 08628

Subject: Notice of Amendment, CPF 1-2013-5022M, dated October 1, 2013
Submission of Written Responses and Request for Hearing

Dear Mr. Coy:

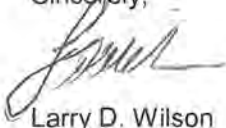
The purpose of this letter and the accompanying document is to provide written responses to the Pipeline and Hazardous Materials Safety Administration (PHMSA) to the above referenced Notice of Amendment (NOA). PHMSA issued the NOA pursuant to its September 24, 2012 inspection of Portland Pipe Line Corporation's (PPLC's) operations and maintenance procedures. The NOA as issued to PPLC by PHMSA was dated October 1, 2013 and was received by PPLC on October 2, 2013. Accordingly, this response is timely.

Following the September 24, 2012 inspection, PPLC acted on the verbal comments of the PHMSA inspector and updated its procedures in its Operations and Maintenance (O&M) Manual in December 2012. The updates were implemented through a Management of Change (MOC) process in accordance with PPLC's operations integrity management system. The attachment to this letter provides a table correlating each of the three NOA items to the corresponding revised O&M Manual sections, and includes the relevant revised sections for reference.

We believe that all three of the items raised by the NOA are addressed by our responses and completed O&M Manual revisions provided in the attached document, and that all three items can be resolved informally without resort to a hearing. However, if in its judgment PHMSA determines that our responses and planned actions do not resolve all the items referenced in the NOA, we respectfully reserve our right to, and hereby request, a hearing on any items left unresolved. If in its judgment PHMSA determines that our response and planned action for an item have resolved the item, then we will withdraw the respective request for hearing.

If you have any questions about the response to the NOA or this request for hearing, or about this matter generally, please do not hesitate to contact Ken Brown, PPLC Engineering Manager, at (207) 767-0449.

Sincerely,



Larry D. Wilson

Enclosure

cc: D.E. Cyr, T.A. Hardison, N.D. Payeur, K.P. Brown, File EG 174

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