



April 5, 2012

Mr. Wayne Lemoi
Director, Southern Region, PHMSA
Pipeline and Hazardous Materials Safety Administration
233 Peachtree Street NE, Suite 600
Atlanta, GA 30303

RE: **CPF 2-2012-6007M**
Genesis Pipeline Alabama, LLC (Genesis) Audit, February 13-16, 2012
Response to Notice of Amendment, March 20, 2012

FedEx Tracking No.: **798251533630**

Dear Mr. Lemoi:

A comprehensive safety evaluation was performed on pipeline facilities operated by Genesis Pipeline Alabama, LLC (Genesis-AL) Castleberry Pipeline, on February 13 – 16, 2012. As an outcome of the inspection, alleged inadequacies were identified relative to 49 CFR 195.422. In response, Genesis-AL is proposing an amendment to its Liquid Operations Maintenance and Emergency Procedure Manual (LOM&E), Section 2.14 to include language requiring any pipe, valve, or fitting, used for the replacement in repairing pipeline facilities, be designed and constructed in accordance to Title 49 CFR 195.422.

In order to mitigate the inadequacies of the aforementioned section, Genesis-AL proposes the following language below in amendment to section 2.14 of the Liquid OM&E Manual:

“Design and Construction

- All replacement pipe must meet the requirements in 49 CFR 195.112 (new pipe) or 195.114 (used pipe).
- All replaced pipeline components must comply with the requirements listed in DOT 195.101.

Important Point: The length of replacement pipe must not be less than one-half the diameter of the pipe to be repaired. It is recommended that the length of replacement pipe not be less than 1.5 pipe diameters. [ASME B31.4-451.6.2(b) (1)]

Important Point: When pipe or pipeline components are replaced, the entire line section must be retrofitted to accommodate the passage of an instrumented internal inspection device. This does not apply to:

RECEIVED APR 09 2012

- Manifolds
- Piping at pump stations, meter stations, pressure reducing stations, and tank farms
- Crossovers
- Sizes of pipe for which an instrumented internal inspection device is not commercially available
- Offshore pipelines less than 10 inches in diameter that deliver to onshore facilities [195.120]

Rather than use the exemptions listed in § Part 195.120(b), each new pipeline and each line section of a pipeline where the line pipe, valves, fitting, or other line component is replaced must be designed and constructed to accommodate the passage of instrumented internal inspection devices.

Preparation of equipment for maintenance, permits, lockout/tagout and isolation list will be performed as prescribed in the HSSE Procedure Manual. All components must meet the standard for new construction as set forth in the DOT regulations and applicable engineering standards.

Response planning for repair shall include the necessary equipment, trained personnel aware of and familiar with the hazards to public and personnel safety, and appropriate repair materials.

All pipe that is to be used for repair must be marked showing the pipe grade, wall thickness, seam type, test pressure and the manufacturer or it must be identifiable with inventory records or material transportation record (MTR) that show that information. All installed pipe must be coated and cathodically protected in accordance with Section 2.19.

No valve, pipe or fitting shall be used for repair or replacement in the pipeline facilities, unless it is designed, constructed, and tested as required in Title 49 CFR, Part 195 and Section 2.17.

The pipe used as replacement pipe in repairs made to a pipeline system must have been hydrostatically tested with water in accordance with Pipeline Integrity Testing, Section 2.17.

All repairs to the pipeline system that involve replacement of any line pipe, valves, flanges, fittings, or other pipeline components will be constructed to allow passage of internal inspection devices (pigs) for each "Line Section".

A "Line Section" is defined as a continuous run of pipe between:

- Adjacent pressure pump stations;
- A pressure pump station and terminal or breakout tanks;
- A pressure pump station and a block valve; or
- Adjacent block valves.

Temporary repairs made necessary to protect the public and for operating purposes shall be made in a safe manner. Such temporary repairs shall be made permanent or replaced in a permanent manner as soon as practical.

If it is determined that an emergency situation exists or deadlines for construction are approaching, then the repaired line section need not be constructed to allow for passage of an internal inspection device. If this occurs, a Company Representative will petition the Federal DOT for a finding of approval that construction to allow passage of an internal inspection device was impracticable. If the approval is denied, then modifications will be made to the repaired line section during the first year after the denial of exemption from enabling passage of an internal inspection device.”

Please see the attached copy of the amended section in our AL, Liquid OM&E Manual for your review. We appreciate the opportunity to work with the Pipeline and Hazardous Materials Safety Administration regarding the safe operation of our pipelines.

If you have any questions or comments, please feel free to contact me directly at 713-860-2542 or by e-mail at Jeff.Gifford@genlp.com.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeffrey W. Gifford".

Jeffrey W. Gifford
Vice President, HSSE

Attachment

Document Number Liquid & CO ₂ OM&E 2.14	Revision Number 24
Page 9 of 28	Revision Date March, 2012

Replacement of Pipe and Pipe Components

“Design and Construction

- All replacement pipe must meet the requirements in 49 CFR 195.112 (new pipe) or 195.114 (used pipe).
- All replaced pipeline components must comply with the requirements listed in DOT 195.101.

Important Point: The length of replacement pipe must not be less than one-half the diameter of the pipe to be repaired. It is recommended that the length of replacement pipe not be less than 1.5 pipe diameters. [ASME B31.4-451.6.2(b) (1)]

Important Point: When pipe or pipeline components are replaced, the entire line section must be retrofitted to accommodate the passage of an instrumented internal inspection device. This does not apply to:

- Manifolds
- Piping at pump stations, meter stations, pressure reducing stations, and tank farms
- Crossovers
- Sizes of pipe for which an instrumented internal inspection device is not commercially available
- Offshore pipelines less than 10 inches in diameter that deliver to onshore facilities [195.120]

Other than for the exemptions listed in § Part 195.120(b), each new pipeline and each line section of a pipeline where the line pipe, valves, fitting, or other line component is replaced must be designed and constructed to accommodate the passage of instrumented internal inspection devices.

Preparation of equipment for maintenance, permits, lockout/tagout and isolation list will be performed as prescribed in the HSSE Procedure Manual. All components must meet the standard for new construction as set forth in the DOT regulations and applicable engineering standards.

Response planning for repair shall include the necessary equipment, trained personnel aware of and familiar with the hazards to public and personnel safety, and appropriate repair materials.

Document Number Liquid & CO ₂ OM&E 2.14	Revision Number 24
Page 10 of 28	Revision Date March, 2012

All pipe that is to be used for repair must be marked showing the pipe grade, wall thickness, seam type, test pressure and the manufacturer or it must be identifiable with inventory records or material transportation record (MTR) that show that information. All installed pipe must be coated and cathodically protected in accordance with Section 2.19.

No valve, pipe or fitting shall be used for repair or replacement in the pipeline facilities, unless it is designed, constructed, and tested as required in Title 49 CFR, Part 195 and Section 2.17.

The pipe used as replacement pipe in repairs made to a pipeline system must have been hydrostatically tested with water in accordance with Pipeline Integrity Testing, Section 2.17.

All repairs to the pipeline system that involve replacement of any line pipe, valves, flanges, fittings, or other pipeline components will be constructed to allow passage of internal inspection devices (pigs) for each "Line Section".

A "Line Section" is defined as a continuous run of pipe between:

- Adjacent pressure pump stations;
- A pressure pump station and terminal or breakout tanks;
- A pressure pump station and a block valve; or
- Adjacent block valves.

Temporary repairs made necessary to protect the public and for operating purposes shall be made in a safe manner. Such temporary repairs shall be made permanent or replaced in a permanent manner as soon as practical.

If it is determined that an emergency situation exists or deadlines for construction are approaching, then the repaired line section need not be constructed to allow for passage of an internal inspection device. If this occurs, a Company Representative will petition the Federal DOT for a finding of approval that construction to allow passage of an internal inspection device was impracticable. If the approval is denied, then modifications will be made to the repaired line section during the first year after the denial of exemption from enabling passage of an internal inspection device."