



PLAINS
PIPELINE, L.P.

August 16, 2018

Mr. James A. Urisko
Director Office of Pipeline Safety
Pipeline and Hazardous Material Safety Administration, Southern Region
233 Peachtree Street Ste. 600
Atlanta, GA 30303

Subject: CPF 2-2018-5002.

Dear Mr. Urisko,

The purpose of this letter is to provide additional information regarding the pipeline reversal project that Plains Pipeline, LP (Plains) submitted through the Operator Registry Notification process on May 14, 2018.

The Bidirectional Project was originally scheduled to be completed by September 01, 2018, meaning the anticipated notification would have been made well within the 60-day notice requirement. However, Plains was informed by the customer that their, then existing market, would be shutdown effective July 01, 2018, and to keep from stranding barrels in the field the customer asked that we expedite the Bidirectional project. Within a couple of days, Plains submitted the notification with the July 01, 2018, line reversal date, and acknowledges that in doing so the deadline for the 60 day notification to PHMSA was missed by 12 days. Consequently PHMSA had 48 days in which to schedule and witness the reversals.

In consideration of the fact that PHMSA had 48 of the 60 days in which to conduct any inquiries and/or inspections, Plains is respectfully requesting that the preliminary assessment penalty of \$36,200 be reduced.

We appreciate the opportunity to present this information and should you have any questions you may contact me by email at DGore@paalp.com, or call 713-646-4419.

Sincerely,

Wm. Dean Gore, Jr
Vice President
Environmental and Regulatory Compliance