



National Cooperative Refinery Association

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May 3, 2013

VIA US MAIL: 7005 0390 0001 6511 5193

David Barrett
Director, Central Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

Subject: CPF 3-2013-5012M, Notice of Amendment

Dear Mr. Barrett:

Pursuant to II.a of the "Response Options for Pipeline Operators in Compliance Proceedings," National Cooperative Refinery Association (NCRA), on behalf of NCRA, Jayhawk Pipeline, L.L.C. and Kaw Pipe Line Company, is notifying PHMSA that we are not contesting the Notice of Amendment as stated in the subject letter dated April 5, 2013 received on April 8, 2013. The following is NCRA and Jayhawk's response to the 2 items listed:

Item (1) NCRA is revising the Integrity Management Plan to consider the transport of small undetected releases, spray releases and subsurface releases.

Item (2) NCRA has adopted the TapRoot® system for performing root cause analysis. The Incident Reporting and Investigation Policy and Operations and Maintenance Manual have been revised to reflect the use of TapRoot® and the criteria for performing the TapRoot® investigations. Managers, Supervisors, Foremen and EHS personnel have received TapRoot® training.

Please contact James Wilson at (620) 241-9253 if you have additional questions or comments.

Sincerely,

Richard S. Petersen
Vice President, Transportation

c: James Wilson
Daryl Cram
Doug Grauer
Craig Harms