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June 6, 2017

Mr. Allan C. Beshore
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, Missouri 64106-2641

Re: Notice of Amendment
White Cliffs Pipeline, LLC
CPF3-2017-5003M

Dear Mr. Beshore:

Pursuant to the Notice of Amendment, CPF3-2017-5003M, dated May 11, 2017, White Cliffs Pipeline respectfully submits the following response to PHMSA's noted deficiencies in our operation and maintenance procedures identified during the inspection conducted October 3rd - 14th.

The Pipeline Hazardous Materials Safety Administration (PHMSA) issued a Notice of Amendment for the items noted below. White Cliffs Pipeline has reviewed the Operations and Maintenance Manual making revisions to enhance and further define their procedures:

1. §195.402 Procedural manual for operations, maintenance and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedure s for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be review at intervals not exceeding 15 months, but at least once each calendar year and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:
(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

White Cliffs Pipeline procedures at the time of the inspection were simply repeat of the code. The procedures did not indicate which valves are necessary for the safe operation of its pipeline system or how they would ensure the valve were in good working order.

White Cliffs Pipeline Response:

White Cliffs Pipeline reviewed the Operations and Maintenance procedure "195.420 – Valve Maintenance" following amendments to the procedure identifying the valves for safe operation and adding steps to ensure valves are in good working order. White Cliffs respectfully submits this procedure amendment.

Procedure

Rose Rock Midstream has identified mainline valves as those which are necessary for the safe operation of the pipeline. During emergency response, mainline valves are shut-in to isolate mainline segments.

- Inspection and testing of mainline block valves shall be made twice each calendar year (not to exceed 7 ½ months) to ensure their good mechanical condition and functioning at the proper pressure.
1. Notification:
 - a. Except during an emergency, approval to perform maintenance on mainline valves shall be obtained from operating personnel. The Control Center shall be notified prior to performing maintenance.
 - b. Additional notification will be provided to outside operators affected by the maintenance of a mainline valve.
 - c. Upon completion of the valve maintenance, notification will be made to the Control Center and outside operators that the work is complete.
 2. Semi-Annual Block Valve Inspection
 - a. Routine maintenance shall be performed during the required valve inspection frequencies, or more often as conditions dictate to ensure valves are in good working order.
 - b. Prior to operation of a valve, contact the Control Center.
 - c. Twice each calendar year, all mainline block valves and river crossing valves shall be operated to a degree that determines the valve is freely operational.
 - d. Upon testing the valve, the valve will be returned to its original position.
 - e. The maintenance of the valve will be documented on the "Valve Inspection Log." This list of mainline valves are identified as valves which ensure the safe operation of the pipeline.
 - f. One inspection will be performed prior to freezing weather at which time any valves with body bleed capability will be drained of any accumulated water.
 - g. Where used, the stem protector will be inspected to be certain that the protector is secure to the valve. Visual inspection of the indicator shall be made.
 - h. Such items as condition of the gears, ease of operation, condition and position of indicator, water tightness of seals around indicator, corrosion, etc., shall be checked. Bonnets, flanges and stem packing are to be inspected for leaks.
 - i. Verify valve is adequately supported.
 - j. Valves in need of maintenance shall be reported to the Maintenance Supervisor who will schedule corrective repairs.
 - k. Maintenance on the valves will be performed to manufacturer specifications for lubrication, packing glands, valve stems and actuator adjustments.
 - l. An abnormal condition which occurs during valve maintenance shall be reported to the supervisor.
2. **§195.402 (a) See above**

- (d) *Abnormal operation.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:
- (5) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

White Cliffs Pipeline procedures did not address how they would determine the effectiveness of the abnormal operations procedures. The procedures did not address who would review procedures or how often the procedures would be reviewed.

White Cliffs Pipeline Response:

White Cliffs reviewed the Operations and Maintenance procedure 195.402 (d) Abnormal Operations specific to the section for effectiveness review. Based on this review, the Abnormal Operating Condition Section 7 of the procedure revisions are noted as follows:

DOCUMENTATION OF AOC AND PERIODICALLY REVIEWING THE RESPONSE OF OPERATORS TO DETERMINE THE EFFECTIVENESS OF ABNORMAL PROCEDURES 195.402(D) (5))

- 7. Upon completing the Abnormal Operation Document (AOD), the AOD will be emailed to the Control Room and District Manager for review and approval. Managers will review each AOD considering the effectiveness of procedures and personnel's response to the event. The effectiveness review will be documented by the manager's review and by responding to the following questions noted on the AOD.
 - a. Were abnormal operating condition procedures effective in handling the event? Yes, No, N/A
 - b. Did the employee(s) responding to the abnormal operations take the appropriate corrective actions? Yes, No, N/A

White Cliffs Pipeline appreciates the review conducted by PHMSA and the recommendations to improve our operations and maintenance procedures. We believe we have adequately addressed the two noted concerns in the Notice of Amendment. Should you have questions or require additional information, please contact Teri Anderson, Manager, DOT Compliance with SemGroup Corporation at 918-524-8109.

Sincerely,



David Minielly
Vice President, Crude
White Cliffs Pipeline, LLC

cc: Edith Coen, Director, Health, Safety and Environmental
Celeste Johnson, Attorney Senior
Matt Franzen, Vice President Operations