



October 25, 2019

Kristin Baldwin
Presiding Official
Office of the Deputy Chief Counsel
Pipeline and Hazardous Materials Safety
Administration
East Building, 2nd Floor
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Via Email: Kristin.Baldwin@dot.gov

Re: Wolverine Pipe Line Company ("Respondent")
Respondent's Pre-Hearing Submissions
CPF No. 3-2019-5015M

Dear Ms. Baldwin:

Pursuant to your letter dated August 27, 2019, please find attached Respondent's pre-hearing submissions in this case, same related to the hearing scheduled for November 5, 2019, at the PHMSA Chicago office, regarding the referenced Notice of Amendment ("NOA"). The following materials are submitted herewith:

- A. Respondent's Amended and Restated Statement of Issues, dated October 25, 2019
- B. Resume of Dan Cooper
- C. Email from Steve Iseminger to Naila Alexander, dated February 1, 2018, transmitting the attached TIARA Report for the Kennedy Avenue to Niles Loop
- D. Excerpt, Section 195.420, Wolverine Pipe Line Company DOT Operations and Maintenance Manual
- E. Excerpt, Section 3, Wolverine Pipe Line Company Integrity Management Program in High Consequence Areas, Version 2014-1
- F. Facilities Inspection and Maintenance Management System, Wolverine Pipe Line Company Valve Inspection Program, June 15, 2017, Revision 3.0
- G. ExxonMobil Pipeline Company Threat Identification and Risk Assessment Manual, August 2007
- H. Threat Identification and Risk Assessment (TIARA) Process, October 17, 2019
- I. Photographs of valves in Lockport Station (Valves 21, 22, 24, 25 and 26)
- J. Photograph of Kennedy Avenue Valve



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Respondent intends to use a portion of the foregoing documents as demonstrative exhibits during the hearing. By copy of this letter, Respondent is providing said materials to Region counsel, Melanie Stevens, as well as the Director, Central Region, Allan Beshore.

During the hearing, Respondent intends to call the following individuals as witnesses:

1. Dan Cooper, HT Engineering, Inc., Contract Risk and Integrity Specialist, Wolverine Pipe Line Company
2. George Caddick, Area Supervisor, Wolverine Pipe Line Company

Respondent also plans to have the following individuals attend the hearing:

- Matt Dunne, Vice President, Wolverine Pipe Line Company
- Thomas Slosson, Safety, Health and Environment Supervisor, Wolverine Pipe Line Company
- Cindy Charron, Operations Support Supervisor, Wolverine Pipe Line Company
- Steve Iseminger, Safety, Health and Environment Manager, Wolverine Pipe Line Company
- Benjamin Drake, Murchison Law Firm, PLLC
- Court Reporter (Chimniak Court Reporting; the individual's name will be provided prior to the hearing date)

Respondent intends to question OPS personnel with personal knowledge of the facts underlying the alleged inadequacies set forth in the NOA and in the underlying case file.

Respondent will be represented at the hearing by the undersigned and by Roina Baker, Murchison Law Firm, PLLC.

Respondent requests, and reserves the right, pursuant to 49 C.F.R. § 190.211(g), to submit further written material after the hearing for inclusion in the record. Respondent further requests the opportunity to receive and respond to the Director's written evaluation and recommendation (49 C.F.R. § 190.209(b)(7)). Thank you for your consideration in this matter.

Sincerely,

Vince Murchison
Counsel for Respondent

cc: Melanie Stevens, PHMSA (Via Email: Melanie.Stevens@dot.gov)
Allan Beshore, OPS (Via Email: Allan.Beshore@dot.gov)

