



October 25, 2019

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

Via Email: [Kristin.Baldwin@dot.gov](mailto:Kristin.Baldwin@dot.gov)

Re: Wolverine Pipe Line Company (“Respondent”)  
**Respondent’s Pre-Hearing Submissions**  
CPF No. 3-2019-5016

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 Probable Violation (“NOPV”). 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. Letter from Ivan A. Huntoon to Robert C. Luckner, dated April 19, 2002
- D. Email from Dan Cooper to Dean Skaggs and Bobby Tinkham, dated March 29, 2016, Re: JO-KA 2015 Repair Plan Amendment – Dig 34.5 (Odo 240404.2)
- E. Email from Steve Iseminger to Naila Alexander, dated August 13, 2018, Re: 2017 PHMSA Audit – Additional Request
- F. Emails regarding communications on Detroit Metro Access Project, dated July 26, 2017; August 8, 2017; and November 10, 2017
- G. Potential Immediate Repair Conference Call Minutes, email dated June 26, 2015
- H. Excerpt, Section 4, Wolverine Pipe Line Company Integrity Management Program in High Consequence Areas, Version 2014-1
- I. Electro-Mechanical Procedures, Date Last Edited: March 19, 2015
- J. JO-KA Repair Plan Summary, dated October 19, 2015
- K. Field Inspection/Repair Worksheet for Dig 31 on Joliet to Kennedy Avenue
- L. SCADA Points List for Woodhaven Station
- M. Point Change Request Form for Woodhaven Station – In Progress



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- N. Point Change Request Form for Woodhaven Station – Final
- O. Hourly Maximum Pressures for Dailey Station, November 25, 2014
- P. Semi-Annual DOT Valve Inspection, Completed October 17, 2017
- Q. Point Change Request (Point to Point) Form for South Metro Parkway Valve Site
- R. DTE Energy Company Detail of Current Charges for South Metro Parkway, Service Period July 15- August 1, 2017
- S. Safe Operating Pressure vs. MOP at Anomaly Locations, October 25, 2019
- T. NOPV Item 6 Comparison of PHMSA Days Late to Should Have Been Days Late, October 24, 2019
- U. Wolverine Work Steps for Immediate Repair Conditions and Related Pressure Reduction, Last Updated October 14, 2019
- V. NOPV Item 4 Timeline for South Metro Parkway Valve Site
- W. Drawing of South Metro Parkway valve site, Drawing No. W-140-303, Rev. No.2
- X. Photographs of South Metro Parkway valve site, February 28, 2017
- Y. Photograph of Valve V18 in the Albion Pump Station
- Z. Photographs of Valve V14 in the Marathon Bay City Terminal
- AA. Photographs of valves in Lockport Station (Valves 21, 22, 24, 25 and 26)
- BB. Photograph of valve at Olive Road
- CC. Photograph of valve at Wilder Road

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. Thomas Slosson, Safety, Health and Environment Supervisor, Wolverine Pipe Line Company
2. Cindy Charron, Operations Support Supervisor, Wolverine Pipe Line Company
3. Steve Iseminger, Safety, Health and Environment Manager, Wolverine Pipe Line Company
4. Dan Cooper, HT Engineering, Inc., Contract Risk and Integrity Specialist, Wolverine Pipe Line Company
5. 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
- 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 violations and the proposed civil penalties set forth in the NOPV and in the underlying case file and Violation Report.

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,

A handwritten signature in blue ink, appearing to read 'V. Murchison', with a long horizontal flourish extending to the right.

Vince Murchison  
Counsel for Respondent

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

