

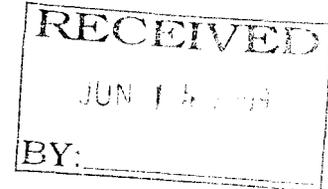
PLAINS

PIPELINE, L.P.

FED-EX DELIVERY

June 12, 2009

Mr. Rodrick M. Seeley
Regional Director – Southwestern Region
Pipeline and Hazardous Material Safety Administration
8701 South Gessner Road, Suite 1110
Houston, Texas 77074-2949



RE: Response to Notice of Amendment, CPF 4-2009-5004M

Dear Mr. Seeley:

Plains Pipeline, L.P. (Plains) submits the following response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA's) Notice of Amendment CPF 4-2009-5005. This letter provides a response to Items 5B through 5F and Items 6 and 7. PHMSA stated in its letter of March 4, 2009 that Plains' previous responses to the other items in the letter were satisfactory and that no further action on these items is required.

1. Item 5B - §195.405 Protection against ignitions and safe access/egress involving floating roof tanks.

The Operations and Maintenance (O&M) Manual has been revised to list the applicable preventative measures in API Recommended Practice 2003, Sixth Ed. "Protection Against Ignitions Arising Out of Static, Lightning, and Stray Currents" to prevent static electricity buildup and discharge when filling floating roof tanks when the roof is not floating on the liquid. The O&M limits the incoming product fill velocity to a maximum of 3 feet per second. A table is also provided showing the flow rate in barrels per hour for various size fill lines that is equivalent to a fill velocity of 3 ft/sec. Other preventative measures listed in API RP 2003 as they apply to filling aboveground storage tanks are also given in the revision.

2. Item 5C - §195.307 Pressure testing aboveground breakout tanks.

Plains Specification PAALP-ENG-SPC-TAN-007(formerly PAALP-001-ST-007), "Storage Tanks New Construction (API 650) has been revised to allow tank shell testing in accordance with API 650 Section 5.3.5(b) if testing in accordance with API Section 5.3.5(a) cannot be performed because of a lack of water. In addition, Plains Specification PAALP-ENG-SPC-TAN-004, "Above Ground Storage Tank Inspection, Repair, and Maintenance has been revised to include hydrostatic testing when a tank meets any of the criteria for hydrostatic testing in

API 653, Section 12.3.1.1(a), (b), or (c). If a tank is not hydrostatically tested per Section 12.3.1, the tank will be subject to the requirements of Section 12.3.2.

3. Item 5D - §195.428(a) Overpressure safety devices.

Plains O&M Manual Section 418 has been revised to include thermal relief valves in its procedures to inspect and test overpressure devices.

4. Item 5E - §195.428(c) Overfill protection systems.

The Plains O&M manual has been revised to include in its procedures that an overfill protection system in accordance with API Recommended Practice 2350 will be installed on all aboveground breakout storage tanks that are constructed or significantly altered after October 2, 2000. The revision also states that any storage vessel constructed or significantly altered according to API Standard 510 will be equipped with an overfill protection system meeting the requirements of Section 5.1.2 of API Standard 510.

5. Item 5F - §195.432 Inspection of breakout tanks.

Section 420 of the Plains O&M manual has been revised to reference tank inspection requirements in accordance with API 653 Section 6 to be consistent with the latest revision of API 653 incorporated by reference in 49CFR195.

6. Item 6 - §195.402(c)(7) Starting up and shutting down the pipeline system.

Plains has conducted a thorough review of the normal start-up and shut-down procedures for the Cushing Terminal, Lumberton Station, and Eucutta Station. Based on the review we are confused about PHMSA's comment that the procedures do not provide enough detail to cover start-up and shutdown of the pipeline system and monitoring during normal operation. The procedure lists the steps required for pre-startup, startup, operation, and shutdown, including the operating parameters the operator is required to monitor and record during normal operation. The review did result in revising the procedure for performing over/short determinations on a daily basis to clearly reflect that a comparison of deliveries and receipts over a 24-hour period was an over/short determination.

7. Item 7 - §195.402(d) Abnormal operation.

A written procedure giving the actions an operator shall take in response to high tank level alarms is being developed for the Cushing Terminal that will apply to all tank terminals. All terminal operators are trained and qualified through the Plains Operator Qualification Program for DOT Pipelines to take the proper

Mr. R. Seeley
Southwest Region Director, PHMSA
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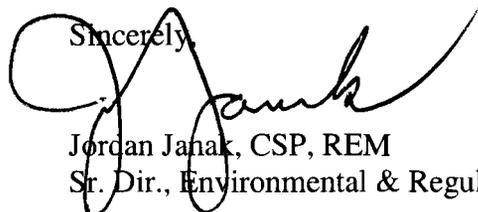
response actions for high tank level alarms and other abnormal conditions that could result in a tank overflow.

The procedure for the Lumberton Station in Section 225.3 and Section 226.3 for the Eucutta Station have been modified to include an additional step for investigating and responding to abnormal operating conditions. This step lists the abnormal operating conditions and references the sections of the O&M manual for investigating and correcting the conditions.

The stations are designed with an audible alarm which can be heard by the operators throughout the station when an alarm condition is annunciated. Furthermore, the stations are assigned a cell phone which is carried by the operator on duty to ensure the operator can be contacted at all times.

We believe that these responses satisfactorily address the outstanding items listed in PHMSA's Notice of Amendment, CPF 4-2009-5004M. If you have any questions, or require additional information, please do not hesitate to contact me, (713) 993-5162, jjjanak@paalp.com.

Sincerely,



Jordan Janak, CSP, REM
Sr. Dir., Environmental & Regulatory Compliance

cc: S. Falgoust B. Fivecoat
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