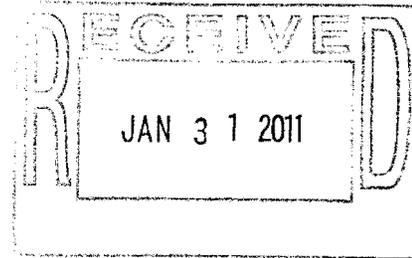


**PLAINS**  
PIPELINE, L.P.



**Overnight Delivery**

January 28 2011

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 CPF 4-2010-7001M**

Dear Mr. Seeley:

Plains Pipeline, L.P. (Plains) submits the following response to the Pipeline and Hazardous Material Safety Administration's, Notice of Amendment, dated December 13, 2010. The inadequacies found have been addressed by revising Plains procedure for "Offshore Depth of Cover, and Plains' document "Offshore Pipeline Condition Report".

**Notice of Amendment (NOA)**

**§195.57 Filing offshore pipeline condition reports.**

During an inspection conducted at the Plains Abbeville, La. District Office on June 21-24, 2010, the PHMSA representative stated that Plains procedure O&M-431, Normal Operating Procedures, Offshore Depth of Cover Procedure, did not include the requirement to file the report with the findings of the exposed pipe segments within 60-days of the completion of the inspection and that the procedure references the incorrect address to be used when filing the Report.

**Response** – Plains amended the procedure to include the following information: "The report will be filed within 60 days after completion of the inspection of all underwater pipelines subject to CFR 49, 195.413(a) and sent to the Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration, Department of Transportation, Information, Resources Manager, PHP-10, 1200 New Jersey Avenue, SE. Washington, DC 20590.

Also, we would like to note that during the revision process, Plains revised the number of the Procedure from form 431 to its present number of 429.

**§195.413 Underwater inspection and reburial of pipelines in the Gulf of Mexico and its inlets.**

Furthermore, during the inspection the PHMSA representative stated that the procedure lacked details involving inclement weather and that Plains neglected to

Mr. R. Seeley  
PHMSA SW Region Director  
Response to CPF 4-2010-5014  
September 15, 2010  
Page 2 of 2

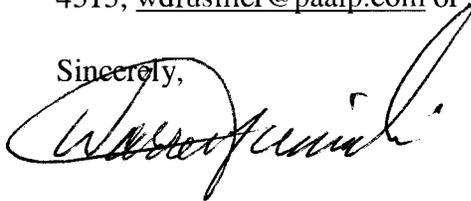
include in the procedure the effects of inclement weather on the interval between subsequent inspections.

**Response** – Plains has amended the Procedure to include the following information regarding inclement weather and the effects on intervals between subsequent inspections:

“When a weather event occurs in the Gulf of Mexico that has the potential to disturb the seabed the District Manager, or designee will evaluate the trajectory and determine whether any pipelines subject to 49 CFR 195.413 were in the path of the storm. Also, agency Advisory Bulletins from the Pipeline and Hazardous Materials Safety Administration (PHMSA) and Notice to Leases from the Bureau of Ocean Energy Management, Regulation and Enforcement (BOERME) will be monitored and reviewed for guidance. The District Manager or designee will then determine whether further evaluation, such as a depth of cover survey will need to be conducted. If a depth of cover survey is conducted, as determined by the evaluation, the interval for the next routine periodic inspection noted above will start from the completion date of the inclement weather inspection.”

If you have any questions, please do not hesitate to contact Warren Fusilier, (713) 646-4515, [wdfusilier@paalp.com](mailto:wdfusilier@paalp.com) or Jordan Janak, (713) 993-5162, [jrjanak@paalp.com](mailto:jrjanak@paalp.com).

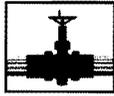
Sincerely,



Warren Fusilier  
Director, Gulf Coast Division  
Environmental & Regulatory Compliance

Enclosures: O&M Section 429, amended  
Offshore Pipeline Condition Report

cc: J. Janak  
T. Valenzuela  
J. Mount



**PLAINS**  
PIPELINE, L.P.

**OPERATIONS &  
MAINTENANCE  
MANUAL**

Chapter

**Normal Operating Procedures**

Subject

**Offshore Depth of Cover Procedure**

**Introduction**

Whenever it is discovered that a Plains pipeline in the Gulf of Mexico and its inlets, in waters 15 feet and less in depth, except for Plains pipelines 4 ½ inch nominal diameter or smaller, is exposed on the seabed or constitutes a hazard to navigation, appropriate action must be taken as outlined in this section and a report filed.

**Applicability**

49 CFR Part §195.413 and §195.57

**General  
Requirements and  
Guidance**

A Hazard to Navigation is defined as a pipeline where the top of the pipe is less than 12 inches below the seabed in water less than 15 feet, as measured from the mean low water.

The Gulf of Mexico and its inlets is defined as the waters from the mean high water mark of the coast of the Gulf of Mexico and its opening to the sea (excluding rivers, tidal marshes, lakes, and canals) seaward to include the territorial sea and Outer Continental Shelf to a depth of 15 feet, as measured from the mean low water.

Plains will conduct periodic inspections at 5-year intervals, to assure its pipelines do not constitute a hazard to navigation, or if so, that appropriate action will be taken to correct the hazard. During the period between inspections Plains will use Pipeline Patrols, travel required for personnel movement and information from third parties to determine if any of our pipelines have become a hazard to navigation. This will be documented on the appropriate Right of Way Inspection form 204.

When a weather event occurs in the Gulf of Mexico that has the potential to disturb the seabed the District Manager, or designee will evaluate the trajectory and determine whether any pipelines subject to 49 CFR 195.413 were in the path of the storm. Also, agency Advisory Bulletins from the Pipeline and Hazardous Materials Safety Administration (PHMSA) and Notice to Leases from the Bureau of Ocean Energy Management, Regulation and Enforcement (BOERME) will be monitored and reviewed for guidance. The District Manager or designee will then determine whether further evaluation, such as a depth of cover survey will need to be conducted. If a depth of cover survey is conducted, as determined by the evaluation, the interval for the next routine periodic inspection noted above will start from the completion date of the inclement weather inspection.

**Action required**

- Promptly, but not later than 24 hours after discovery of an exposed pipeline, or one that poses a hazard to navigation, the following actions shall be taken,

*Note: **Exposed underwater pipeline** means an underwater pipeline where the top of the pipe protrudes above the underwater natural bottom (as determined by recognized and generally accepted practices) in waters less than 15 feet (4.6 meters) deep, as measured from mean low water.*

*Note: **Hazard to navigation** means, for the purpose of this part, a pipeline where the top of the pipe is less than 12 inches (305 millimeters) below the underwater natural bottom (as determined by recognized and generally accepted practices) in water less than 15 feet (4.6 meters) deep, as measured from the mean low water.*

- Notify the National Response Center, telephone: 1-800-424-8802 of the location, and if available, the Loran C coordinates, the state plane coordinates (X,Y), or the latitude and longitude of the exposed pipe.

The District Manager or designee will contact the Regulatory and Environmental Compliance Department, who will notify the National Response Center.

- Promptly, but not later than 7 days after discovery, mark the location of the pipeline in accordance with 33 CFR Part 64 at the ends of the pipeline segment and at intervals of not over 500 yards long, except a pipeline segment less than 200 yards long need only be marked at the center.

“Special Marking Requirements - Temporary marking of the exposed pipe should follow the recommendations of the Eighth Coast Guard District in New Orleans. The recommended marking for exposed pipe in shallow waters (15 ft. or less) includes using YELLOW LIGHTED BUOY (S) with a slow flashing yellow light. Slow flashing means less than 30 times per minute.

Where water depth is too shallow for floating a lighted buoy, a structure may be established on pile, pipe, PVC or other suitable materials that will support a flashing yellow light and day mark. The day mark must be 3-foot base diamond, white with orange retro reflective borders and 6 inch black letters worded “DANGER - EXPOSED PIPELINE.”

- Within 6 months after discovery, or not later than November 1 of the following year if the 6 month period is after November 1 of the year that the discovery is made, bury the pipeline so that the top of the pipe is 36 inches below the seabed for normal excavation or 18 inches for rock excavation.
- The Engineering Department may apply alternatives to burial that meet or exceed the level of protection provided by burial.

If Plains cannot obtain required State or Federal permits in time to comply with this section, the Office of Pipeline Safety will be notified by letter, specifying whether the permit is State or Federal, and justify the delay.

*“Possible Safety Related Condition - At some point before the pipe is lowered or repaired, it is expected that the exposed section will be examined for possible damage. If damage is discovered during the examination of the exposed pipe, the Division personnel should evaluate the damage with respect to Safety-Related Conditions.”*

**Documentation**

All reporting, marking, and reburial actions must be properly documented.

Use Plains Form 025 "Offshore Condition Report" to report the following information;

- ✓ Operator name and address
- ✓ Provide date of report, and name, job title, and telephone number of person submitting the report
- ✓ Report total number of miles of pipeline inspected
- ✓ For each pipeline segment reported provide the date of installation and length.
- ✓ Include the state or federal offshore block and tract number

The report will be filed within 60 days after completion of the inspection of all underwater pipelines subject to CFR 49, 195.413(a) and sent to the Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration, Department of Transportation, Information Resources Manager, PHP-10, 1200 New Jersey Avenue, SE. Washington, DC 20590.

Forward all survey reports, maps, graphs and forms to the Division PHMSA Records Specialist and as designated by the District Manager. Maintain all records for five years or until previous and current surveys have been inspected by a PHMSA/State Agency inspector.

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## Offshore Pipeline Condition Report

DOT REF: **195.57**      INSPECTION FREQUENCY: **Within 60 days after completing inspection of underwater pipeline.**

**GENERAL DATA**

DIVISION	DISTRICT
----------	----------

<b>GENERAL LOCATION</b>		LINE ID
COUNTY/PARISH	STATE	

Each operator shall, within 60 days after completion of the inspection of all its underwater pipelines subject to 195.413(a), report the following information:

1. Name and principal address of operator.

Name \_\_\_\_\_  
 Address \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

2. Date of report: \_\_\_\_\_

3. Name, job title, and business telephone number of person submitting the report.

Name \_\_\_\_\_  
 Job Title \_\_\_\_\_  
 Business telephone \_\_\_\_\_ Type in numbers only

4. Total number of miles (kilometers) of pipeline inspected. \_\_\_\_\_

5. Length and date of installation of each exposed pipeline segment, and location; including, if available, the location according to the Minerals Management Service or state offshore area and block number tract.

Length \_\_\_\_\_  
 Date \_\_\_\_\_ Type mm/dd/yyyy  
 Location \_\_\_\_\_  
 Location/MMS \_\_\_\_\_  
 Offshore Area \_\_\_\_\_ Block Number Tract \_\_\_\_\_

6. Length and date of installation of each pipeline segment, if different from a pipeline segment identified under paragraph (a)(5) of this section, that is a hazard to navigation, and the location; including, if available, the location according to the Minerals Management Service or state offshore area and block number tract.

Length \_\_\_\_\_  
 Date \_\_\_\_\_ Type mm/dd/yyyy  
 Location \_\_\_\_\_  
 Location/MMS \_\_\_\_\_  
 Offshore Area \_\_\_\_\_ Block Number Tract \_\_\_\_\_

Date: \_\_\_\_\_ Completed by (print): \_\_\_\_\_

mm/dd/yyyy

Signature: \_\_\_\_\_