



**ConocoPhillips  
Pipe Line Company**

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Rod Seeley Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 S. Gessner  
Suite 1110  
Houston, Texas 77074

RE: CPF No. 4-2012-5005



Dear Mr. Seeley:

This letter is in response to your letter dated March 1, 2012 regarding the Notice of Probable Violation (NOPV), Proposed Civil Penalty, and Proposed Compliance Order received by ConocoPhillips Pipe Line Company (CPPL) on March 5, 2012.

By submitting this response, CPPL does not waive any right, privilege or objection that it may have in any separate or subsequent proceeding related in any way to the information provided in this response.

**Item 1: §195.208 Welding of supports and braces.**

- a. **Supports or braces may not be welded directly to pipe that will be operated at a pressure of more than 100 p.s.i. (689 kPa) gage.**

**PHMSA Response:**

During the onsite inspection it was observed that the main pump units at the Clifton Ridge Terminal had braces that were welded directly to the suction and discharge piping of both pumping units. The brace's were connected to threaded adjustment rods used to line up the piping with the pump suction and discharge flanges. PHMSA inspectors were notified that the pumps and piping were upgraded to the current configuration in 1996.

**CPPL's Response:**

*After reviewing the system in question and having additional discussions with the Southwest Region office, the only supports that will need to be removed are the supports not connected to a full encirclement sleeve. CPPL has identified only one support on Pump 10 that is welded to a reinforcement pad on the pipe and will need to be removed. CPPL will shut the pump down and lock it out and remove the adjustment rod as*

*requested by your office. CPPL will install a full encirclement sleeve on pump 10 before putting the unit back in service.*

**Item 2. §195.402 Procedural manual for operations, maintenance, and emergencies.**

- b. General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed 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 commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

**PHMSA Response:**

During the inspection it was noted that ConocoPhillips Pipe Line Company's (ConocoPhillips) did not follow their procedures. Specifically, the valve maintenance required by §195.420 was not performed according to ConocoPhillips' procedure MPR-6005. The procedure, MPR-6005 *Inspections and Testing – Block Valve Inspection* requires that non-mainline isolation valves necessary for the safe operation of the DOT/PHMSA pipeline/pipeline facility are to be inspected at intervals not exceeding 7 ½ months, but at least twice each calendar year. The non-mainline valves are required to be visually inspected and do not need to be operationally checked.

**CPPL's Response:**

*CPPL had identified and corrected the problem during pre-auditing in 2010. As a result of the 2010 pre-audit, CPPL entered the valve inspections into an automated system that sends out reminders to the field when the inspections are due. To prevent a recurrence, CPPL will implement an Unintentional Event (UE) notification that will be sent to all CPPL Terminal Managers for review and to increase awareness of the need to properly document valve inspections. The UE is used to provide other groups within the company the lessons learned, and will drive a mandatory review of the applicable procedures to better understand CPPL's valve inspection and documentation requirements.*

**Item 3. §195.581 Which pipelines must I protect against atmospheric corrosion and what coating material may I use?**

- c. You must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.**

**PHMSA Response:**

ConocoPhillips did not adequately clean and coat portions of pipelines that were exposed to the atmosphere and at soil-to-air interfaces to protect against atmospheric corrosion. The following areas were observed during the field inspection of ConocoPhillips facilities and were found to be inadequate:

- a. The piping and check valve flange connected to Pump 4 on the Pecan Grove line had coating failure and corrosion.
- b. The 30-inch line from Clifton Ridge Terminal breakout tanks had coating failure and corrosion at the soil-to-air interface.
- c. Valve 94490 attached to Tank- 347 in the Lake Charles Refinery had coating failure and corrosion on the flange.

**CPPL's Response:**

*CPPL has addressed the areas of concern that are mentioned in the compliance order. Upon receiving the final order CPPL will provide photos of the completed work.*

Upon receipt of the Final Order, CPPL will complete the necessary actions associated with items 1 and 3 of the proposed compliance order. Further, CPPL does not contest the preliminary assessed civil penalty of \$19,800 for item 2. Any necessary payment of a civil penalty will be done in accordance to the instructions included in the Final Order.

Please let me know if you have any questions or comments regarding this matter.

Sincerely,



Todd Tullio  
Manager, Regulatory Compliance

CC. Dave Barney/CPPL  
Van Williams/CPPL  
Miles Kajioka/CPPL  
Gabe Munoz/CPPL  
John Roark/CPPL