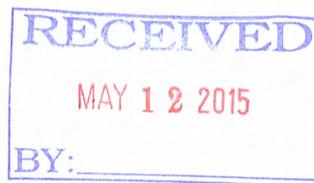


**PLAINS**  
**ALL AMERICAN**  
**PIPELINE, L.P.**

May 7, 2015



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 Warning Letter;**

**CPF 4-2015-5011W**

Dear Mr. Seeley:

Plains Pipeline, L.P. (Plains) submits the following response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA's) Warning Letter CPF 4-2015-5011W. Plains considers it important to provide this response in order to provide some clarification and correct the record on the two (2) probable violations of the Pipeline Safety Regulations, Title 49 CFR 195 cited in PHMA's letter. The warning letter resulted from a new construction audit of Plains' Basin Pipeline Pipe Replacement Project between Jal, New Mexico and Wink, Texas.

### **1. Probable Violation of §195.222(a) Qualification of Welders**

It appears that there may have been some miscommunication or confusion regarding the welding procedures used for the project construction and the procedures used for the qualification of the project welders.

- Project welding – the replacement pipe for the project was 20 in. diameter, 0.344 w.t., Grade X-60 pipe. The welding procedure used for the construction welding was Plains procedure CS-G60L203;
- Welder qualifications – the project welders were “multiple qualified” on 12 in. diameter, 0.375 w.t., Grade X-42 pipe in accordance with API 1104, Section 6.3.1. The procedure used for the butt weld was CS-G60L203 and the procedure for the branch weld was CS-F52M214.

PHMSA asserts that using procedure CS-G60L203 on the X-42 grade pipe used for welder qualification was a violation of 49 CFR§195.222 and API 1104, Sec. 6.1 because “*the welders did not qualify using a grade of material within in the range of the Plains qualified welding procedure,*” (CS-G60L203). PHMSA also asserts a violation of API 1104, Section 6.1 which requires that welders be qualified “*using previously qualified procedures.*” Plains provides the following response to PHMSA's comments:

- 1) PHMSA correctly states that the grade of pipe used for welder qualification was not within the range of material grades listed on the welding procedures used to qualify the welders, CS-G60L203 and CS-F52M214. Although the X-42 pipe used for welder qualification was outside the range of the procedure, the welds produced on the X-42 pipe nevertheless must be considered acceptable under API 1104, Sec 5.4.2.2 PHMSA states on page 2 of its letter, "*When welding materials of two separate material groups, the procedure for the higher strength group shall be used.*" (API 1104, Sec. 5.4.2.2) Although no X-42 pipe was welded to X-60 pipe, this statement supports the acceptability of using a procedure qualified on a higher strength material group for welding material of a lower strength group.
  
- 2) The requirement in API 1104, Sec. 6.1 that qualification testing will be performed "*using previously qualified procedures*" simply means that the procedures used must be any previously qualified procedures that are acceptable for welding the grade of pipe used in qualification testing, and that the essential variables for welder qualification are consistent between the qualification procedure and production welding procedure. In the case of the Basin Project, the welders could have used a butt weld procedure that was qualified for pipe grade of less than or equal to X-42 which would have made the qualification welding in strict compliance with the procedure. However, the use of procedure CS-G60203 produced welds meeting required mechanical properties because that procedure was qualified on a higher grade of pipe than that used for the welder testing. Likewise with the branch weld, a fillet weld procedure qualified on X-42 pipe could have been used, but the procedure that was actually used, CS-F52M214, also produced acceptable welds because it was qualified on a higher grade of pipe. Also, using the procedure for qualification that will be used for production welding can be viewed as preferable because it gives the welders the opportunity to become familiar with the procedure that will be used during production welding.

## **2. Probable Violation of §195.214 Welding Procedures**

PHMSA asserts that Plains did not have proper welding procedures in place for the construction of the Basin Pipeline. At the time of the audit, Plains erroneously presented PHMSA with Procedure Specification CS-G4265L205 which PHMSA correctly noted was in violation of the material groupings of API 1104, Sec. 5.4.2.2. Plains stated this procedure was used on the Basin project but correspondence to PHMSA after the audit corrected this error. This procedure was not used on the project. This was an old, out dated procedure which has been removed from Plains' active welding procedures.

As part of this probable violation, PHMSA stated on page 3 of its letter that qualifying welders using CS-F-52M214 on X-42 was a violation of API 1104 because they "*did not qualify to the specifications stated in the Plains Welding Procedure Specifications.*" As discussed above in item 1, using a welding procedure qualified on grade X-52 for welding grade X-42 produces acceptable welds and meets the intent of API 1104. The acceptability of the welds made by the

Mr. Rodrick Seeley  
Director, Southwest Region, PHMSA  
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April 22, 2015  
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As a result of PHMSA's finding, Plains will conduct a review and training with its construction supervisors to ensure they fully understand welding procedure selection for welder qualification and production welding. This review and training will focus on ensuring they understand that procedures used must be qualified according to API 1104, Sec. 5.4.2.2 material groupings that are consistent with the grade of pipe used in welder qualification and project welding.

In conclusion, the welding procedures and welder qualifications for construction of the Basin Pipe Replacement project did not violate § 195.222(a) or §195.214 of the Pipeline Safety Regulations, or the requirements of API 1104, Sections 5 and 6. .

If you have any questions, or require additional information, please contact Jordan Janak. He is available to discuss our response at your convenience.

Sincerely,



Troy E. Valenzuela  
Vice-President, Environmental, Health and Safety

cc: T. McLane *JM 5.8.15*  
D. Gore  
W. Roberts  
S. Atkins  
P. Higginbotham