



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

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May 31, 2017

Ms. Terri Binns
Acting Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner, Suite 1110
Houston, TX 77074

Shell Pipeline Company LP

One Shell Plaza
910 Louisiana Street
42nd Floor
Houston, Texas 77002-5316

SUBJECT: CPF 4-2017-2003M

Dear Ms. Binns:

On May 5, 2017, Shell Pipeline Company LP (SPLC) received a Notice of Amendment (NOA) from the Pipeline and Hazardous Materials Safety Administration (PHMSA), Southwest Region regarding the inspection of SPLC's Operations and Maintenance procedures that took place between June and November 2016.

Below is an explanation of how each item in the NOA was addressed. The revised pages have been attached. Additionally, the directly applicable text on each page has been highlighted.

Item 1: Responding to Increase or Decrease in Pressure or Flow Rate

SPLC's "Control Room Procedure Section IV: Emergency and Abnormal Conditions" was modified to include considerations for responding to, investigating and correcting the cause of increases or decreased in pressure or flow rate outside normal operating limits.

Item 2: Continuing Surveillance

SPLC's "Pipeline Inspection and Maintenance Manual, Section 9.6" was modified to outline a procedure for continuing surveillance of its facilities regulated under 49 CFR 192.

Item 3: Record Retention

SPLC's "Pipeline Inspection and Maintenance Manual, Section 3.31.1 was updated to specify a 5 year minimum retention period for all records for each patrol, survey, inspection and test required by subparts L&M of 49 CFR 192.

At this point I believe that SPLC has addressed all of the items in the NOA. As requested in the NOA, we are also sending an electronic version of this response via e-mail. If you have any questions regarding this response or need any additional information, please contact me at (713) 241-2035.

Sincerely,

A handwritten signature in black ink that reads "Deborah Price". The signature is written in a cursive style with a large, looped initial "D".

Deborah Price
Integrity & Regulatory Services Manager
Shell Pipeline Company LP

Attachments