



Edward LaCour
General Manager, Technical Services

November 13, 2017

Ms. Terri J. Binns
Acting Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 830
Houston, TX 77074

CPF 4-2017-7005M

Dear Ms. Binns:

In response to the Notice of Amendment issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA), and received by Chevron Pipe Line Company (CPL), as Operator of Whitecap Pipeline Company, L.L.C, (Whitecap) on October 23, 2017, CPL respectfully submits the language below for inclusion in Whitecap's maintenance and inspection procedure, MIP-502, *Internal Corrosion Control*, to address the matters identified in the Notice of Amendment.

CPL is not contesting the matters raised by PHMSA and is in the process of revising the procedure accordingly to address the concern.

NOA Issue: Whitecap should amend its procedure for "Inspection of Removed Pipe" to include the method that will be used to determine the strength of internally corroded pipes based on actual remaining wall thickness or at the least cross reference section 5.6 of Chevron's Integrity Management manual in its Internal Corrosion Manual.

CPL Response to NOA Issue: CPL will modify the language in Section 6.5 of its procedure MIP-502 to include the changes captured in red, below:

6.5 Inspection of ~~Removed~~ Pipe (~~Removed and Remaining~~)

1. Any time a pipe is removed from service for any reason, it must be inspected for evidence of internal corrosion. Before removing any pipe, mark the exposed pipe to identify the 12 o'clock position and an arrow indicating flow direction.

2. Observe and document the internal condition of the removed pipe, as well as the condition of the **remaining** pipe that was upstream and downstream of the removed pipe, both circumferentially and longitudinally.
3. Sampling for MIC should be done as soon as possible once the pipeline is exposed to the atmosphere.
4. If the pipe is clean and shows no signs of corrosion, the information is entered in the FDC database and no further action is needed.
5. If the inspection indicates that there is evidence of corrosion, a more intense inspection is required. The following actions should be included:
 - a. The corroded area inside the pipe should be cleaned and measured by direct methods, if possible. If it is not possible to measure directly, alternatives such as radiography or ultrasonic methods may be used.
 - b. **Contact a Pipeline Integrity Technologist to evaluate the corrosion and determine if further remedial action is necessary. The evaluation could include using the ASME B31.G Modified remaining strength calculation.**
 - c. Note the measurements and appearance of the corrosion on the FDC database.

Thank you for your consideration of CPL's response to the Notice of Amendment on behalf of Whitecap. If you have any questions regarding this response, please contact Mr. David McMasters at 713-372-6859 (office) or 713-447-7942 (cell).

Sincerely,



Edward LaCour
General Manager, Technical Services