

January 19, 2021

VIA ELECTRONIC DELIVERY & FASCIMILLE

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Mary L. McDaniels, Director, Southwest Region
8701 S. Gessner, Suite 630,
Houston, TX 77074

Re: CPF 4-2020-017-NOA

Administrator:

Centurion Pipeline L.P., henceforth referred as 'CPL,' received the Notice of Amendment (NOA) dated December 22, 2020, and does not contest the Notice. In response to the Notice of Amendment dated December 22, 2020, CPL is proposing herein the following changes for each amendment or CPL is providing documentation of the actions it has taken in response to the NOA.

In regard to NOA Item 1, CPL's Operations and Maintenance (OM) Manual was updated on September 25, 2020, shortly after the conclusion of the inspection of CPL's procedures. The updated OM Manual reflects the inclusion of the associated provision mentioned in the NOA in procedure, P-195.64: Pipeline Construction and National Registry of Pipelines. The update includes requiring CPL to notify PHMSA of the reversal of product flow direction when the reversal is expected to last more than 30 days and when a pipeline converted for service under § 195.5, or a change in commodity as reported on the annual report as required by § 195.49. product. The referenced procedure has been attached as Item A.

NOA Item 2 requires that a defined required frequency of reviewing personnel performance of the procedure be included. CPL has revised OM Manual P-195.403: Emergency Response Training procedures to address NOA Item 2. The OM Manual was updated January 13, 2021, and clarifies that all operator qualified personnel will review CPL's Oil Spill Response Plan, at intervals not exceeding 15 months, but at least once each calendar year followed by the documentation process. Operations Supervisors will be required to complete, annually and successfully, the FEMA Incident Command System online training course. Once each calendar year at intervals not exceeding 15 months, the HES Department will conduct a review of the performance of personnel in meeting the objectives of the emergency response training program and will make recommendations for any changes in the training program or the procedures. The referenced procedure has been attached as Item B.

CPL's Integrity Management Plan (IMP) has been amended to address NOA Item 3. CPL's IMP Section 1 has been updated to cross reference CPL's Inline Inspection Tool Validation Procedure and Section 2 has been updated to include API 1163, ANSI/ASNT ILI-PQ and NACE SP0102-2010. CPL's IMP Section 1 and 2 has been attached as Item C and CPL's Inline Inspection Tool Validation Procedure has been attached as Item D.

The attached documentation demonstrates CPL's compliance with all items from the NOA. In the event of no information or actions, CPL respectfully request that PHMSA administratively close the NOA.

Please feel free to contact me at 346-803-2681 or at Michael_Morgan@centurionpl.com.

Respectfully submitted,

Michael Morgan
Vice President Operations & Engineering
Centurion Pipeline, L.P.
3600 W. Sam Houston Parkway, Westchase II, Suite 500
Houston, Texas 77042

cc: Cutty Cunningham, Director Integrity Management, Centurion Pipeline, L.P.