



PLAINS
PIPELINE, L.P.

January 5, 2021

Certified Mail No: 7008 1830 6105 9719

Ms. Mary McDaniel
Regional Director – Southwestern Region
Pipeline and Hazardous Material Safety Administration
8701 S. Gessner, Suite 630
Houston, Texas 77074

**Subject: Notice of Probable Violation and Proposed Compliance Order CPF 4-2020-5013
Plains Pipeline, L.P., Stockholm Station, Caddo and Hagerman to Lynch 16” Pipelines**

Dear Ms. McDaniel:

On November 6, 2020, Plains Pipeline L.P. (Plains), received an email with Notice of Probable Violation (Notice) and Proposed Compliance Order (Order) CPF 4-2020-5013 dated November 5, 2020, from Pipeline and Hazardous Materials Safety Administration (PHMSA) concerning an inspection of procedures and facilities in Midland, Texas; Cushing, Oklahoma; parts of New Mexico, and Missouri. On November 12, 2020, Plains requested a 30-day extension until January 6, 2021, to provide a reply to the Notice, which PHMSA granted in a letter dated November 13, 2020. The Notice (1) made findings of probable violations that included three items, (2) made a determination not to conduct additional enforcement action or penalty assessment proceedings concerning Notice Items 1 and 2 at this time, (3) required Plains to submit written comments or request a hearing under 49 Code of Federal Regulations (CFR) 190.211 concerning this Notice, and (4) included an Order concerning Item 3. Plains has completed actions to correct Notice Items 1 and 2. The following are Plains’ comments concerning Notice Item 3 and the associated Order requirements, which are paraphrased for brevity below in ***bold italicized text***, followed with Plains responses:

1. ***49 CFR 195.589 (c)***

Notice: Plains failed to maintain records in sufficient detail to demonstrate the adequacy of its corrosion control measures or that corrosion requiring control measures does not exist on the Hagerman to Lynch 16” pipeline. First, Plains’ ‘Data Gathering for Reactivating or Operational Changes on PAALP Pipelines’ document from June 2018 indicated that 52 pipeline exposures were identified from a close interval survey carried out in 2013. However, Plains was unable to provide any records to demonstrate that there is no corrosion requiring control measures or that the 52 exposure conditions had been remediated.

Order Item 3A: In regard to Item number 3 of the Notice pertaining to 52 exposed portions on the Hagerman to Lynch 16” line identified during a close interval survey conducted in 2013, Plains must review these conditions to ensure that no corrosion requiring control measures exist and where conditions requiring control measures exist, must submit a remedial plan within 30 days of receipt of the Final Order.

Plains’ Response: Plains does not contest this item and will review these conditions and submit a remedial plan, if needed, within 30 days of receipt of the Final Order.

2. **49 CFR 195.589 (c)**

Notice: Plains failed to maintain records of annual inspections carried out on the cathodic protection system on Tank 201. During the field inspection, it was determined there was cathodic protection on the tank bottom, but no pipe to soil survey records were provided for the cathodic protection monitoring. Plains was unable to provide any records demonstrating that cathodic protection inspections had been conducted on Tank 201 for the period from 2012 through November 2019. Therefore, Plains failed to maintain records in sufficient details to demonstrate the adequacy of corrosion control measures or that corrosion requiring control measures does not exist as required by §195.589(c).

Order Item 3B: In regard to Item number 3 also of the Notice pertaining to failure to provide cathodic protection monitoring records for breakout tank 201, Plains must provide records of cathodic protection monitoring for 2019 and 2020 within 30 days of receipt of the Final Order.

Plains' Response: Plains has enclosed the 2020 and 2019 cathodic protection records for Tank 201.

3. ***Order Item 3C:*** It is requested (not mandated) that Plains maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Mary L. McDaniel, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.

Plains' Response: Plains will provide PHMSA the requested safety improvement cost information after it has completed all work required to fulfill the Compliance Order.

Should you have any questions regarding this response you may contact me directly at 713-646-4152, email at PDHodgins@paalp.com or contact Kevin Cunningham by email at KHCunningham@paalp.com, or call 713-993-5568.

Sincerely,



Patrick D. Hodgins
Vice President, Health, Safety, & Environmental

Enclosure

cc:

John Shelton, Plains
Kevin Cunningham, Plains
Ngiabi Gicuhi, Plains
Sandra Tasso, Plains
Todd Smith, Plains
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