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May 28, 2020

FEDERAL EXPRESS TRACKING NO.: 7705 6871 4880

Mary McDaniel
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner – Suite 630
Houston, TX 77074

**Subject: CPF 4-2020-7002 - Proposed Compliance Order
Empire Pipeline LLC (OPID: 39069)**

Ms. McDaniel,

Please see attached documentation, including an electronic copy, to comply with the proposed compliance order to periodically review the work performed by operating personnel to evaluate the effectiveness of Empire Pipeline LLC's O&M procedures in accordance with 49 CFR 195.402 (c)(13):

Procedure Development:

- Section F.1, Page 74 -76 of Empire Pipeline LLC's O&M Core Manual
 - Describes the procedure to periodically review the work performed by operating personnel in order to evaluate the effectiveness of the procedure as written.
- Appendix D – Operations, Maintenance, Corrosion Inspection Forms, Page 289-292
 - Provides forms to be utilized during procedure reviews as well as normal operations and maintenance.

Conduct Review of Work:

- Procedure Review of O&M Manual, August 2019
 - Lists all procedures reviewed as detailed.
- Operator & Procedure Review, 2019-2020
 - O&M Procedure Reviews performed from November 2019 through May 2020 utilizing the procedures as described in Section F.1, Page 74-76 of Empire Pipeline LLC's O&M Core Manual.

Should you have any questions or need additional information, please contact Maryanne Ward at 504-828-2564, Ext. 2 or maryanne@empirepipelinellc.com.

Sincerely,

EMPIRE PIPELINE LLC

A handwritten signature in blue ink, appearing to read 'Everard W. Marks III', is written over the company name.

Everard W. Marks III
Chief Executive Officer