



HOLLY ENERGY PARTNERS

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Mr. Chris Hoidal, Director  
Office of Pipeline Safety  
Pipeline and Hazardous Material Safety Administration  
12300 W. Dakota Avenue, Suite 110  
Lakewood, CO 80228

*Certified Mail: 7005 1820 0002 6884 6652*

Dear Mr. Hoidal,

Holly Energy Partners is in receipt of your letter regarding the Notice of Amendment, CPF 5-2007-5011M, for the Mountain Home Tank Farm and Pipeline to Mountain Home Air Force Base in Mountain Home, Idaho.

In compliance with the requirements of 49 CFR 190, Subpart B governing Holly Energy Partners response to the Notice of Amendment, we are offering the following information for your consideration.

Holly Energy Partners has made revisions to the Operations and Maintenance (O&M) Procedures Manual to include the requirement for inspection of the physical integrity of in-service atmospheric and low-pressure steel aboveground breakout tanks according to Section 6 of API 653.

Enclosed are the amended procedures for your review and approval. Should additional information be required, please feel free to contact me at (505) 746-5218.

Sincerely,

James G. Townsend  
Vice President - Operations

Corporate Office  
100 Crescent Court, Suite 1600  
Dallas, Texas 75201-6927  
214-871-3555

Operations Office  
P.O. Box 1260 / 311 W. Quay  
Artesia, New Mexico 88210  
505-748-8940

Enclosure

according to a plan included in the operations and maintenance manual under §195.402(c)(3).

- (c) Each operator shall inspect the physical integrity of in-service steel aboveground breakout tanks built to API Standard 2510 according to section 6 of API 510.
- (d) The intervals of inspection specified by documents referenced in paragraphs (b) and (c) of this section begin on May 3, 1999, or on the operator's last recorded date of the inspection, whichever is earlier.

## 2. Procedure

### 18.1 HEP-O&M-195.432 (Inspection of in-service breakout tanks)

18.1.1 The purpose of this procedure is to establish a standardized method for inspecting in-service aboveground storage tanks designed and built to American Petroleum Institute (API) 650 and its predecessor API 12C. The procedures are written and designed in accordance with and to comply with section 6 of API Standard 653, and section 6 of API 510 where applicable.

#### 18.2.1 Responsibilities:

18.2.1.1 The Supervisor or designee shall perform annual tank inspection.

#### 18.3.1 Type and Frequency of Inspections:

- The annual tank inspection shall be completed annually, not to exceed 15 months.
- The Company's Annual Tank Inspection Form shall be filled out upon completion of each annual tank inspection.
- The external condition of the tank shall be monitored by close visual inspection from the ground on at least a monthly basis.
- The in-service inspection shall include a visual inspection of the tank's exterior surfaces and any evidence of leaks, shell distortions, signs of settlement, corrosion, condition of the foundation, paint coatings, insulation systems and appurtenances should be documented for follow-up by an authorized inspector.

## External Inspections

- All tanks shall be given a visual external inspection by an authorized inspector and must be conducted at least every 5 years. Tanks may be in operation during this inspection.
- Insulated tanks need to have insulation removed only to the extent necessary to determine the condition of the exterior wall of the tank or the roof.
- Tank grounding shunts or mechanical connections of cables shall be visually checked.

## Ultrasonic Thickness Inspections

- When used, the ultrasonic thickness measurements shall be made at intervals not to exceed 5 years when the corrosion rate is not known.
- When the corrosion rate is known, the maximum interval shall be the smaller of  $RCA/2N$  years (where RCA is the difference between the measure shell thickness and the minimum required thickness in mils and N is the shell corrosion rate in mils per year) or 15 years.

## Cathodic Protection Surveys

All above-ground breakout tanks in the company's system are cathodically protected. Periodic surveys of the system are conducted in accordance with API RP 651 and the results are reviewed at least annually by the Cathodic Protection Supervisor.

## Internal Inspections

Internal inspection is required to ensure that the tank bottom is not severely corroded and leaking, to gather the data necessary for the minimum bottom shell thickness assessments detailed in Section 6 of API 653 and to identify and evaluate any tank bottom settlement.

All tanks shall have a formal internal inspection conducted at intervals determined by the corrosion rates measured during previous inspections or anticipated based on experience with tanks in similar service.

Internal inspections will be conducted on all above-ground breakout tanks by an authorized inspector at intervals required and in accordance with Section 6.4 of API 653.

### 18.4.1 Discrepancies or Findings during Inspection:

- Any discrepancies or findings noted during the required inspections shall be documented on the appropriate form and distributed to the Regulatory representative and Area Manager.