



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

## NOTICE OF AMENDMENT

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 15, 2008

Mr. John Traeger  
Manager of Pipelines and Terminals  
Front Range Pipeline, LLC  
803 Highway 212 South  
Laurel, MT 59044

**CPF 5-2008-5033M**

Dear Mr. Traeger:

On June 10, 2008, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Front Range Pipeline, LLC procedures for operation and maintenance of breakout tanks in Laurel, Montana.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Front Range Pipeline, LLC plans or procedures, as described below:

- §195.428 Overpressure safety devices and overfill protection systems**  
**(c) Aboveground breakout tanks that are constructed or significantly altered according to API Standard 2510 after October 2, 2000, must have an overfill protection system installed according to section 5.1.2 of API Standard 2510. Other aboveground breakout tanks with 600 gallons (2271 liters) or more of storage capacity that are constructed or significantly altered after October 2, 2000, must have an overfill protection system installed according to API Recommended Practice 2350. However, operators need not comply with any part of API Recommended Practice 2350 for a particular breakout tank if the operator notes in the manual required by §195.402 Why compliance with that part is not necessary for safety of the tank.**

The procedure for establishing and addressing high level alarms on page P-47 of Front Range's operation and maintenance procedures are incomplete. These alarm procedures refer to Table 1 for determining high level alarm set points for each tank, but Table 1 on page P-46 does not contain the elevation that these set points should be for each tank. Additionally, the procedures for high level alarms do not address the unique operating conditions for the two Laurel breakout tanks. Tank 100 was reported as being capable of receiving inflows from ConocoPhillips of which Front Range Pipeline has no control over. Tank 95 is aligned to receive overpressure inflows from the refinery's butane spheres.

To ensure proper alarm levels are set and maintained correctly, Front Range's procedures must include elevations for those high level elevations for each tank. Also, to ensure that operators understand the various operation scenarios for these tanks that could affect alarms, operating conditions that are non-typical should be described in procedures.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to the Notice of Amendment portion of this document and note the response options. Failure to respond within 30 days of receipt of this Notice will be deemed a waiver of your right to contest the allegations set forth above and will authorize the Associate Administrator for Pipeline Safety, without further notice, to find facts as alleged in this Notice and to issue an Order Directing Amendment.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to **CPF 5-2008-5033M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*

cc: PHP-60 Compliance Registry  
PHP-500 G. Davis (#121993)