



01-04-10P12:02 RCVD

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December 30, 2009

Chris Hoidal, Director Western Region  
Pipeline Hazardous Materials Safety Administration  
12300 West Dakota Ave, Suite 110  
Lakewood, CO 80228

RE: CPF 5-2009-0030

Dear Mr. Hoidal:

This letter is in response to your letter dated November 30, 2009 regarding the Notice of Probable Violation (NOPV), received by ConocoPhillips Pipe Line Company (CPPL) on December 03, 2009 issued as a result of an audit that was performed on August 18-19, 2009 on CPPL's California Natural Gas System. CPPL's response to this NOPV is set forth below.

By submitting this response, CPPL does not waive any right, privilege or objection that it may have in any separate or subsequent proceeding related in any way to the information provided in this response.

**PHMSA Concerns:**

- 1. 192.739 Pressure limiting and regulating stations: Inspection and testing.*
- (a) Each pressure limiting station, relief device (except rupture discs), and Pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is—*
- (1) In good mechanical condition;*
  - (2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;*
  - (3) Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of §192.201(a);; and*
  - (4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.*

*ConocoPhillips is not keeping records of required annual inspections of relief devices on its NG 22 and NG 23 pipelines in accordance with §192.739. NG 22 is supplied by SoCal pipeline and NG 23 is supplied by PG&E pipeline and the existing relief devices on both pipelines are under the supplier's control. Since it is incumbent on ConocoPhillips to ensure that adequate over pressure relief exists on all points of their pipelines, ConocoPhillips must ensure that SoCal and PG&E inspect there pressures relief devices in accordance with §192.739(a). ConocoPhillips must retain copies of these pressure*

*relief device inspections or have reasonable access to there records. Alternatively, ConocoPhillips may install an adequate pressure relief device of their own at the beginning of NG 22 and NG 23 pipelines. It should be noted that the inspection and maintenance of these pressure relief devices are OQ covered tasks and the SoCal and PG&E personnel performing these tasks on the devices on NG 22 and NG 23 will need to be OQ qualified in an OQ program acceptable to ConocoPhillips.*

**CPPL's Response:**

Documents attached to this email are inspection records for overpressure devices NG 22 and NG 23. CPPL has reviewed the documents attached and find them acceptable. In 2010 CPPL will install overpressure devices of their own on NG-22 and NG-23. Upon concurrence of the Western Region Office, CPPL believes that this should close out the NOPV that was received on November 30, 2009. Should you or anyone in your staff have any questions please feel free to call me.

Sincerely,



Todd Tullio  
Manager, Regulatory Compliance

CC: H. Monfared  
M. Drumm  
V. Williams

NG-22

GM-1848

# MDO

REPORT DATE: 03/20/09 DUE DATE: 04/30/09 BASE NO: 04 SOUTHERN CALIFORNIA GAS COMPANY REPORT NO: B71600-01  
 INSP DUE: RM PC VL NO LEFT: 21 LEFT: 0 H & R ORDER - CUST MSA PAGE: 1 OF 3  
 DEV NORTH DIST: SAN LUIS OBISPO T.G. MAP: 0000 NON CORE ACCOUNT #: 18-4976-1006-0000017480.  
 SPECIAL INSTRUCTIONS: GM-1848 NON CORE: FL-V \* INDUSTRIAL \* METER #: 11470256-  
 FACILITY TURNED ON: 01/01/73 CORR. READ VALUE: CCF UNC. READ VALUE: CCF NAME: CONOCOPHILLIPS COMPANY  
 REGULATION: DOWNSTREAM REGULATION METER DESC: 3M TQM 740 CD CASE RATE: 7408 ADDR: 6555 HIGHWAY 101  
 ---AUTH: PRESS--ACTUAL PRESS SET DATE: 06/08/04 INSP O/RIDE: APT#: CITY: STMG  
 MTR: DIST: 336.40# DIST PRESS MTR DRIVE: MAG-MID MTR TEST HAND VAL: 10 CF MSA LOC: ZKGGYB BY-PASS: REG PERM  
 DEL: 0050 50.0# 375.0# TEST WITH: AIR HOSE LENGTH: 13 FT LATITUDE: 35 22 46.00 N LONGITUDE: 120 37 59.20 W

### MSA GENERAL HISTORY

(SCH) COND FOUND  
04/09/08  
(UNS) COND FOUND  
11/29/07  
(UNS) COND FOUND  
08/07/07

### \* CUSTOMER MSA INSPECTION RESULTS \*

* INDEX READS *	
CORRECTED	UNCORRECTED
FOUND: 027043	038984
UNIV:	
INDEX:	
LEFT: 027043	038984

MSA GENERAL  
CONDITION CODES:

### \* UNMEASURED BYPASS INFORMATION \*

FROM 9:40 AM FLOW 276 CCFH PRESS 355.7# DATE: 4/27/09  
 TO 1:00 AM FLOW 276 CCFH PRESS 355.8# ARR: 9:12 AM  
 DEP: 12:20 AM  
 INSP BY: J. Dumas  
 \* CUSTOMER ADVISED RULE 15--->   
 \* CUSTOMER WITNESSED INSP---->

### INSTRUMENT INFORMATION & HISTORY

GAUGE: E-80096 KIND: GAS MICRO - SCG ELEV ZONE: 4  
 RANGE: 0 - 500 SET DATE: 10/18/06

### \* ELECTRONIC CORRECTOR TEST RESULTS \*

TEST GAUGE ID: 11074 METER TEST HAND VALUE: 10 CF  
 ACCURACY TEST: AS FOUND 0.0 % AS LEFT 0.0 %  
 TEST PRESS: 357.9#  
 AUX. FACTOR: AS FOUND .9930 AS LEFT .9930  
 EC BIAS EFFECT: AS FOUND -0.7 % AS LEFT -0.7 %  
 AS FOUND COMBINED ACCY: 0.0 % ELEC CORR. CONDITION CODES: (B1)

### INSP O/RIDE:

PCT (SCH): 04/09/08 PCT (UNS): 05/09/07 PCT (UNS): 10/18/06  
 TEST PRESS FOUND TEST PRESS FOUND TEST PRESS FOUND  
 PSIG FACTOR ACCY PSIG FACTOR ACCY PSIG FACTOR ACCY  
 338.4 25.135 + 0.0% 363.1 26.994 + 0.0% 356.7 26.511 + 0.2%

FND AUX FACTOR: 0.993 FND AUX FACTOR: 0.993 FND AUX FACTOR: 0.993

CONDITIONS FOUND GENERAL B1  
 CONDITIONS FOUND GENERAL B1  
 CONDITIONS FOUND GENERAL

### ROTARY METER HISTORY

FMT (UNS): 06/08/04 RM (SCH): 04/09/08 RM (SCH): 05/09/07  
 FOUND LEFT  
 CK + 9.7% + 0.7%

CONDITIONS FOUND GENERAL  
 CONDITIONS FOUND GENERAL  
 CONDITIONS FOUND GENERAL

### \* ROTARY METER TEST RESULTS \*

WATCH WINDOW READS  
 UNC. 038892.4 / 038892  
 CORR. 024609.5100 / 024609  
 4/24/09  
 WATCH WINDOW READS  
 UNC. 038984.3 CCF  
 CORR. 027043.0373 CCF  
 4/27/09  
 (MDO - Richard - dial up OK)  
 ROTARY MTR CONDITION CODES: 4/27/09

REPORT DATE: 03/20/09 DUE DATE: 04/30/09 BASE NO: 04 SOUTHERN CALIFORNIA GAS COMPANY  
 INSP.'S DUE: RM PC VL RG(EXT- 2) (IPR- 5) - M & R ORDER - CUST MSA  
 DIV : NORTH DIST: SAN LUIS OBISPO

REPORT NO: B71600-01  
 PAGE: 3 OF 3  
 T.G. MAP: 0000 NON CORE ACCOUNT #: 18-4976-1006-0000017480

REGULATOR INFORMATION & HISTORY

POS # SIZE MAKE & MODEL FUNCTION STATICS SERIAL NO. ORIFICE  
 2.02 1/2" CIR SEAL559B-4HP-40# PLT RV OPP  
 LAST SCH. INSP. NEXT SCH. INSP. INSP. O/RIDE O/RIDE MOS. BLEED: NO BLEED/INT  
 EXT: 11/29/07 04/30/09 CURE DATE:  
 INT: MFR. DATE:  
 IPR: 04/30/09  
 RC: 04/30/22  
 (UNS) CONDITIONS FOUND  
 11/29/07 (EXT)

SPRING RANGE SETTING LAST SEAT INSTALL  
 L.U. DIFF TYPE DATE  
 2.0# RUBBER 11/29/07  
 \* REGULATOR INSPECTION RESULTS \*  
 LOCKUP UNCHED.  
 DIFFERENCE WORK REGULATOR CONDITION CODES  
 2.0# 60 KIK

REGULATOR INFORMATION & HISTORY

POS # SIZE MAKE & MODEL FUNCTION STATICS SERIAL NO. ORIFICE  
 3.00 2" GROVE 89-LR MED-720# BYPASS-REG  
 LAST SCH. INSP. NEXT SCH. INSP. INSP. O/RIDE O/RIDE MOS. BLEED: NO BLEED/INT  
 EXT: 04/23/04 04/30/09 CURE DATE:  
 INT: MFR. DATE:  
 IPR: 04/17/03 04/30/18  
 RC:

SPRING RANGE SETTING LAST SEAT INSTALL  
 L.U. DIFF TYPE DATE  
 \* REGULATOR INSPECTION RESULTS \* (EXT)  
 LOCKUP UNCHED.  
 DIFFERENCE WORK REGULATOR CONDITION CODES

REGULATOR INFORMATION & HISTORY

POS # SIZE MAKE & MODEL FUNCTION STATICS SERIAL NO. ORIFICE  
 3.01 1/2" RELIANCE Z PILOT S  
 LAST SCH. INSP. NEXT SCH. INSP. INSP. O/RIDE O/RIDE MOS. BLEED: NO BLEED/INT  
 EXT: 11/29/07 04/30/09 CURE DATE:  
 INT: MFR. DATE:  
 IPR: 04/30/18  
 RC: 04/30/18  
 (UNS) CONDITIONS FOUND  
 11/29/07 (EXT)

SPRING RANGE SETTING LAST SEAT INSTALL  
 L.U. DIFF TYPE DATE  
 10.0- 75.0# 55.0# .4# RUBBER 11/29/07  
 \* REGULATOR INSPECTION RESULTS \* (EXT)  
 LOCKUP UNCHED.  
 DIFFERENCE WORK REGULATOR CONDITION CODES  
 1.2

4-24-09  
 ARR: 1:05 PM  
 DEP: 2:20 PM  
 J. Phillip 58 / DUMAS } (CHECKED BYPASS RUN)  
 PERFORMED P.C. INSPECTION  
 CALLED M.D.O. SPOKE W/ LUELLA.

REMARKS: Painted MSA

ACCOUNT #: 18-4976-1006-0000017480

NG-23

# CUSTOMER METER INSTALLATIONS

FM # EC-167

NAME <u>CONOCOPHILLIPS PIPE LINE</u>		LOCATION <u>.4 MILE E/SHANDON T/OFSHANDON</u>	
CONTACT _____	WALL MAP _____	PLAT _____	BLOCK _____
Account No. <u>8051885131-8</u>	SITE ID # <u>77087</u>	AIS # _____	
SERVICE SIZE <u>2"</u>	HOUSELINE SIZE <u>6"</u>	RATE _____	
ELEVATION / ZONE <u>1100' / 4</u>	TOTAL CONNECTED LOAD <u>52</u>	MCF/HR _____	

### METER DATA

MANUFACTURER <b>ROOTS</b>	TYPE <b>ROTARY</b>	MODEL <b>23M125</b>	SIZE <b>4" X 4"</b>	MAX. GWP <b>125</b>
PG&E COMPANY NO. <b>33330638</b>	S/N _____	METERING PRESSURE <b>50#</b>	DELIVERY PRESSURE _____	

### REGULATOR DATA

	PRIMARY	MONITOR	SERVICE	HOUSELINE
MANUFACTURER		<b>ROCKWELL</b>	<b>ROCKWELL</b>	
MODEL & TYPE		<b>461-57</b>	<b>461-57</b>	
SIZE		<b>2"</b>	<b>2"</b>	
PRESSURE RATING		<b>300#</b>	<b>300#</b>	
PRESSURE SETTING		<b>55#</b>	<b>50#</b>	
HEAD SIZE				
INNER VALVE SIZE		<b>1" SINGLE</b>	<b>1" SINGLE</b>	
VALVE SEAT MATERIAL		<b>BRASS</b>	<b>BRASS</b>	
VALVE SEAT TYPE				

### SPRING LOADING DATA

RANGE		<b>55-75#</b>	<b>55-75#</b>	
SPRING PART NO.				
COLOR CODE		<b>BLACK</b>	<b>BLACK</b>	

### PILOT LOADING DATA

SIZE				
MAKE				
MODEL				
RANGE				
SPRING COLOR CODE OR PART #				
ORIFICE SIZE				
FILTER				

### LINE FILTER DATA

SIZE	MAKE	MODEL	MAX. GWP	ELEMENT NO.
<b>3" X 3"</b>	<b>CONSLER</b>	<b>C</b>	<b>300#</b>	<b>1</b>

### RECORDER DATA

MFG. / TYPE	SERIAL NO.	PRESSURE RANGE	TEMP RANGE
<b>5.24 MERCURY</b>	<b>9600900</b>	<b>0-100#</b>	<b>10 TO 140 DEGREES</b>

### AMR EQUIPMENT

MFG / TYPE	SERIAL NO.	FIRMWARE VERSION	SITE PHONE NUMBER

## INSPECTION AND MAINTENANCE RECORD FOR CUSTOMER METER INSTALLATIONS

FMH R-264

NAME Fosco ConocoPhillips Pipe Line

LOCATION .4 mile E/O Shandon T/O.

METER SIZE 23M125

METER NO. 33330688

DATE	MO/DAY/YR	03/17/05	03/07/06	3/13/07	3/10/08	3/11/09	
EMPLOYEE	INITIAL	JVH/JR	Lxhe	JVH	Lxhe	JEUB/JRPZ	
METER READS	UNCORRECTED	182749	202009	226461	247547	262765	
	CORRECTED	084155	093200	104766	114695	121850	
METER PRESSURE AS FOUND	PSIG INCHES WC	49.9#	50*	50#	55#	53#	
METER PRESSURE AS LEFT	PSIG INCHES WC	49.9#	50*	50#	50#	50#	
HOUSE LINE PRESSURE AS FOUND	PSIG INCHES WC	49.9#	50*	50#	55*	53#	
HOUSELINE PRESSURE AS LEFT	PSIG INCHES WC	49.9#	50*	50*	50*	50#	
PRESSURE RECORDING FIXED FACTOR ACCT							
EC-AT CALIBRATION		Y	Y	Y	Y	Y	
DIFFERENTIAL TEST ROTARY METER		Y	N	N	N	N	
OIL LEVEL CHECK ROTARY METER		Y	✓	Y	✓	Y	
SPIN TEST TURBINE METER							
FILTER DIFFERENTIAL	PSI / INCHES WC	⊖	⊖	⊖	⊖	⊖	
LEAK TEST METER SET		Y	✓	Y	✓	Y	
BYPASS LOCKED		Y	✓	Y	✓	Y	
OVER PRESSURE PROTECTION		Y	✓	Y	✓	Y	
VALVES CHECKED		Y	✓	Y	✓	Y	
BILLING MULTIPLIER		1.000 JVH	1.000 Lxhe	1.000 JVH	1.000 Lxhe	1.000 JEUB	
BILLING SUPERVISOR	INITIAL	JVH	JM	JVH	JVH 3/18/8	Lxhe 3/30/09	
MULTIPLIER VERIFIED BY GAS DEPARTMENT	INITIAL	H14 2/25/05 OK	H14 3/19/06 OK	mp 3/28/07	1.000 Lxhe 2/27/08	1.000 JEUB 2/20/09	

LINE OUT ITEMS NOT INSPECTED OR APPLICABLE / X ITEMS INSPECTED OR MAINTENANCE PERFORMED