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Attorneys at Law

DEC 12 2011

BOULDER

VIA FEDERAL EXPRESS OVERNIGHT DELIVERY

December 9, 2011

COLORADO SPRINGS

Jeffrey D. Wiese
Associate Administrator for Pipeline Safety
East Building, Second Floor
1200 New Jersey Avenue, S.E.
Washington, DC 20590

DENVER

Re: Belle Fourche Pipeline Company; CPF 5-2009-5042

Dear Mr. Wiese:

DUBLIN

Enclosed please find an original and three copies of Belle Fourche Pipeline Company's Petition for Reconsideration of Items 13 and 14 from the Final Order issued on November 21, 2011 regarding the above referenced matter.

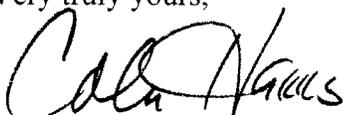
Please date stamp and return the extra copy in the self-addressed stamped envelope provided.

LONDON

Thank you for your courtesies in this matter.

Very truly yours,

LOS ANGELES


Colin G. Harris

CGH/rb

SALT LAKE CITY

Enclosures to all parties

SAN FRANCISCO

cc Mr. Chris Hoidal, Director, Western Region, PHMSA
Manuel Lojo, Esq., Belle Fourche Pipeline Co.

**DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, DC 20590**

_____)
In the Matter of)
)
Belle Fourche Pipeline Company,)
)
Respondent)
_____)

CPF No. 5-2009-5042

DEC 12 2011

**PETITION FOR RECONSIDERATION OF FINAL ORDER REGARDING FINDING
OF VIOLATION OF ITEMS 13 AND 14**

**PETITION FOR RECONSIDERATION AND REQUEST FOR STAY REGARDING
THE COMPLIANCE ORDER ASSOCIATED WITH ITEM 13**

Respondent Belle Fourche Pipeline Company (Belle Fourche) hereby respectfully requests reconsideration of two Findings of Violation in the Final Order in CPF No. 5-2009-5042 and requests a stay of the Compliance Order associated with the Finding of Violation for Item 13 and 14 of the Final Order.

1. The Final Order Finding a Violation of Item 13 Should be Reversed.

The regulation at issue is as follows:

§ 195.577 What must I do to alleviate interference currents?

(a) For pipelines exposed to stray currents, you must have a program to identify, test for, and minimize the detrimental effects of such currents.

OPS alleged as follows:

Belle Fourche’s cathodic protection monitoring records for the 12” Donkey Creek Pipeline in the area in and around Guernsey station and Ft Laramie station for the 2006 calendar year showed several test stations with high off levels. High off levels indicate that cathodic protection interference currents may be adversely affecting a pipeline. Nonetheless, at the time of the inspection, Belle Fourche had not taken the appropriate steps to perform an interference study to determine if there were interference currents on their pipeline or to mitigate any of the interference currents that might exist. The Pipeline Safety Regulations require an operator to identify, test for, and minimize the detrimental effects of stray currents,

In the Final Order, the Associate Administrator for Pipeline Safety (the “Administrator”) ruled that Belle Fourche violated 49 C.F.R. § 195.577. First, the Administrator found that Belle Fourche’s pipeline was “exposed” to “stray currents.” The primary evidence cited was a 2009 Close Interval Potential survey (CIS) performed *after* the Notice of Probable Violation to verify cathodic protection system effectiveness, which confirmed that the pipeline (as previously determined by Belle Fourche) was not affected by interference or “stray” currents. Second, the Administrator found that Belle Fourche did not have a “program to identify, test for, and minimize the detrimental effects of such currents,” even though the Administrator, in finding a violation, relied on information generated from *that very program instituted by Belle Fourche* to investigate and address, if necessary, interference or “stray” currents.

The finding of violation is in error for several factual and legal reasons, as discussed below.

49 C.F.R. § 195.577 concerns electrical currents that flow onto a pipeline from an outside source, such as another cathodic protection system. The regulation is not applicable unless pipelines are “exposed” to “stray currents” also referred to in the regulation as “interference” currents. The terms “expose” and “interference” have meaning; they plainly refer to an instance of *actually* being subjected to an influence, in this case, stray current. Therefore, stray or interference current as defined in the regulation is electrical current flowing from external sources *to a* pipeline and leaving without a physical connection. In addition, the purpose of the regulation is to address *detrimental* stray currents.

The Final Order cites to the 2006-2008 pipe-to soil potential cathodic surveys performed by Belle Fourche as evidence of stray current potential. The purpose of pipe-to soil cathodic surveys is to evaluate the level of cathodic protection being achieved and whether there is potential for high local differences in soil resistivities, interference and other effects that may cause corrosion. As relevant here, the measurement of the structure-to-soil potential was made immediately following the interruption of the cathodic protection. This provided voltage “off” readings. The achievement of cathodic protection is demonstrated by the “off” potential being more negative than certain industry thresholds.

The Pipeline Safety Violation Report stated that the pipeline was “experiencing high off levels, which is an indication that there are cathodic protection interference affecting the pipeline.” Pipeline Safety Violation Report at 21. The pipeline-to-soil records allegedly showing “high” off readings are not sufficient to satisfy PHMSA’s burden of proof. The issue is, what did Belle Fourche do in response to those readings? Specifically, Belle Fourche did not violate the regulation unless PHMSA demonstrated that Belle Fourche lacked a cathodic protection program “to identify, test for, and minimize the detrimental effects of such currents.” 49 C.F.R. § 195.577. This requires PHMSA to prove that Belle Fourche failed to (1) identify interference currents, if any; (2) test for them; and (3) if detrimental, minimize them. Belle Fourche satisfied each of these elements.

First, as set out above, the very purpose of the 2006-2008 surveys was to evaluate, i.e. “test” the cathodic protection system for effects that may cause corrosion, including “identification” of interference currents. As relevant here, the measurement of the structure-to-soil potential was

made immediately following the interruption of the cathodic protection. This provided voltage “off” readings. The achievement of cathodic protection is demonstrated by the “off” potential being more negative than certain industry thresholds. The whole purpose of the surveys was to do that which the Administrator inexplicably found to have never occurred. Even though Belle Fourche thought this was self-evident (i.e., that it had a cathodic protection test program including detection of possible interference currents), Belle Fourche present hearing testimony that its cathodic protection program has always included interference current evaluation. Respondent Hearing Exhibit 10 ¶ 3, attached hereto as Exhibit A. Mr. Doll’s statement was not rebutted at the hearing, and not addressed by the Administrator.

The Final Order misapprehends the pipe-to soil potential cathodic surveys performed by Belle Fourche between 2006 and 2008. The Final Order states that they are “merely cathodic protection survey readings and contain no indication of stray current identifications . . .” However, the Final Order relies on these very survey tests and results to conclude that the pipeline was exposed to stray currents. Final Order at 15 (noting that high “off” levels shown in the 2006-2008 survey records demonstrate exposure to interference currents). The Administrator cannot use the survey as a sword while denying Belle Fourche the right to use the same data as a shield. If, as the Administrator contends, the survey data sustains PHMSA’s burden of proving that the pipeline was exposed to interference currents, then certainly Belle Fourche can rely on that same data to show that it had a program to identify and test for the presence of those very conditions, which it did.

The only remaining issue is whether Belle Fourche addressed the potential that any indications of stray currents demonstrated that such currents were “detrimental” and if so took mitigation measures. Belle Fourche presented un-rebutted evidence that any electrical currents in the area were *not* detrimentally interfering with the pipeline. As explained by Mr. Pete Doll, who has been doing cathodic protection since 1971, all of the pipelines are tied together with either piping, electrical grounding between the different pipeline companies in the area, or by bonds (these allow the transfer of cathodic protection currents between pipelines). Respondent Hearing Exhibit 10 ¶ 4, attached hereto as Exhibit A. As he further testified, *this creates an electrical path taking any emitted current from the pipeline back to its original source. Id.* PHMSA did not respond to this evidence, which unarguably shows that Belle Fourche’s pipeline was not exposed to currents that detrimentally interfered with the pipeline’s cathodic protection. Nor is this evidence acknowledged or refuted in the Final Order. There was no need for any additional “tests” or mitigation, because any issues had already been mitigated.

Contrary to the Administrator’s findings, the August 2009 close interval protection survey (CIS) does not demonstrate liability, but rather demonstrates that Belle Fourche had a program to identify, test for and if necessary mitigation stray currents. The CIS was part of the program to determine if potential stray currents were detrimental. Although Mr. Doll had already concluded they were not based on his investigation and long-standing personal knowledge of the pipeline, he took a “belt and suspenders” approach and commissioned the CIS to confirm his findings. The CIS confirmed that no detrimental stray currents were impacting either of the facilities in the area. Specifically, the survey found that “[a]ll ‘instant off’ or polarized potential are less negative than -1200mV cse, all polarized potentials are also more negative than -850mV cse.... [a] ... potential range [that] falls within the acceptable criteria range as established by NACE and

other generally accepted industry standards.” Respondent Hearing Exhibit 10 ¶ 6, attached hereto as Exhibit A. The mere fact that this report was done after the inspection is not the point. The point is that the CIS validates that Belle Fourche’s program, which in this case included frequent pipe-to-soil potential surveys and Mr. Doll’s knowledge of the mitigation already in place, was working.

The Final Order claims that Belle Fourche “merely assumed there were no problems in the area of its pipeline,” apparently referring to interference currents. Final Order at 16. To the contrary, Belle Fourche performed extensive “on/off” surveys to evaluate that potential, and it confirmed that potential foreign sources of electrical current were properly grounded, bonded or otherwise addressed, as Mr. Doll testified. Respondent Hearing Exhibit 10 ¶ 7, attached hereto as Exhibit A. Then, although it had no regulatory obligation to do so, Belle Fourche took further precautionary steps by having a third party perform the CIS, which confirmed that there were no detrimental stray currents. This is unquestionably a program, and the program worked.

The Final Order also notes that Belle Fourche did not follow “written procedures.” As an initial matter, there was no evidence presented by PHMSA, who has the burden of proof, about the procedures followed by Belle Fourche or about its cathodic protection program. The issue of “written procedures” was never raised at the hearing. More to the point, the Belle Fourche does have written procedures for internal corrosion protection detection, including interference currents. Those procedures, as effective in 2008, are attached. *See* 2008 Operations Manual, attached hereto as Exhibit B.

2. The Final Order Finding a Violation of Item 14 Should be Reversed.

The regulation is as follows:

§ 195.579 What must I do to mitigate internal corrosion?

(a) General. If you transport any hazardous liquid or carbon dioxide that would corrode the pipeline, you must investigate the corrosive effect of the hazardous liquid or carbon dioxide on the pipeline and take adequate steps to mitigate internal corrosion.

OPS alleged as follows:

Since 2006, Belle Fourche has experienced at least three leaks due to internal corrosion, a condition that may be the result of the corrosive effects of the crude oil that is being shipped through its pipeline system. The Pipeline Safety Regulations require an operator who transports a hazardous liquid that could corrode a pipe to investigate and take adequate steps to mitigate that condition. Nonetheless, at the time of the inspection, Belle Fourche had not conducted such an investigation or taken any steps to mitigate that condition.

In the Final Order, the Administrator found that “the agency has never implied, as Respondent suggests, that there must first be confirmed knowledge or reasonable belief on the part of the operator that the product will cause internal corrosion.” Final Order. Belle Fourche did not suggest that PHMSA had ever implied that this was the test. It is apparent that PHMSA does not

think that this is the test. Belle Fourche's position is that PHMSA must enforce 49 C.F.R. § 195.579 as it is written, and not as PHMSA wishes it to be.

The regulation as written does not impose an absolute obligation to conduct an internal corrosion study directed at the potential impact of the liquid shipped in the pipeline. The regulation plainly imposes such an obligation only "if" such liquid "would" corrode the pipeline. "If" does not mean always, and "would" does not mean might or could. Belle Fourche acknowledges that PHMSA has issued an Advisory Bulletin which states that operators must determine if liquids "could" corrode a pipeline, but respectfully submits that this is not what the regulation says and that the Advisory Bulletin is not a regulation.

The net effect of the Final Order is that every operator, irrespective of the nature of the liquids transported in a pipeline, must conduct an internal corrosion study to determine if that liquid might corrode the pipeline. If the pipeline changes the liquid being transported in the pipeline, another study must be commenced. It does not matter what the liquid is. It does not matter how old or new the pipeline is. In other words, the regulation, according to the Final Order, has been modified to read:

§ 195.579 What must I do to mitigate internal corrosion?

(a) General. If you transport any hazardous liquid or carbon dioxide ~~that would corrode the pipeline~~, you must investigate the corrosive effect of the hazardous liquid or carbon dioxide on the pipeline and take adequate steps to mitigate internal corrosion.

The Advisory Bulletin clearly changes the regulation, as demonstrated above. Under the regulation, there must be at least *some* threshold evidence or reason to conclude that a *particular* liquid *would* corrode a pipeline. The plain language compels this result. PHMSA's application of the regulation violates the Administrative Procedure Act and cannot form the basis for a violation. The D.C. Circuit and other courts have continually reprimanded administrative agencies for relying on interpretative guidance (e.g., advisory bulletins) that is really a legislative rule subject to notice and comment rulemaking. *Natural Resource Defense Council v. EPA*, 643 F.3d 311 (D.C. Cir. 2011); *National Mining Association v. Jackson*, 768 F. Supp. 2d 34 (D.D.C. 2011). The Advisory Bulletin relied on in the Final Order changes the law. It effectively removes the words "if" and "would" from the regulation and substitutes "could" which means might which means every operator must perform a corrosion study irrespective of the liquids transported or any other factor. Indeed, PHMSA is unabashed in its determination to change the regulation: the Advisory Bulletin proclaims that "all hazardous liquids regulated under part 195 could be corrosive . . ." 73 Fed. Reg. 71,089 (Nov. 24, 2008). If the standard is now "could" corrode, and if PHMSA maintains that all liquids "could corrode," then the regulation has clearly been changed to mandate corrosion studies under any circumstances. The regulation does not authorize this, and therefore the Final Order for this Item should be reversed.

Oddly, the Final Order asserts that evidence of three leaks involving different pipeline segments and different circumstances supports a finding that Belle Fourche should have performed an internal corrosion study of liquids transported in the pipeline segments. This makes no sense because, according to the Final Order, the test is now whether an operator transports a liquid that

“could” corrode the pipeline, and PHMSA believes that all liquids fit into this category. Therefore, to be consistent, it should make no difference if Belle Fourche had one leak or three or none. It should make no difference if a leak occurred ten minutes after a completely new pipeline commenced startup. It should make no difference if a leak occurred on a pipeline 5,000 miles away from an unconnected pipeline transporting a completely different liquid. Pursuant to the Final Order, operators are now subject to strict liability if they do not automatically and continually perform internal corrosion studies. This is not the law.

To the extent the Final Order does recognize that some level of threshold information is necessary to compel the conclusion that a liquid would corrode a pipeline (which would render the Advisory Bulletin a nullity), there is no rationale provided for distinguishing between leaks that do and do not result in the triggering of the regulation. Is it one? Three? Or is it two, as apparently was the case in the prior enforcement decision cited in the Final Order. Final Order at 18. Does it matter whether the leak was caused by the nature of the liquid, rather than another corrosion-related reason? If not, what is the point of § 195.579, which plainly directs an operator to focus on the potential connection between the type of liquid and its ability to cause internal corrosion? Here, the April 30, 2006 leak took place in a different state on a pipeline segment unconnected to the other leak sites carrying a different crude type; the December 22, 2007 leak took place on an out-of-service pipeline that was being purged of oil shortly before the leak; and the July 15, 2008 leak took place on a pipeline that had been idle for several months. If these distinctions carry no weight, then it appears that any leak, no matter what the circumstances, compels an operator to do a corrosion study of its entire system, no matter how differentiated it may be and no matter what liquids are being transported in different segments. Also, no evidence was presented that these leaks resulted from corrosion caused by the specific type of liquid transported. Belle Fourche respectfully submits that the Final Order leaves the regulated community without any standard to evaluate applicability, and that three distinct leaks did not trigger the regulation.

3. The Compliance Order Associated with Item 13 Should be Reversed, and a Stay of the Compliance Order Should be Granted Pending a Decision on this Request

The Proposed Compliance Order is as follows:

In regard to Item Number 13 of the Notice pertaining to High “Off” CP levels on the 12” Donkey Creek Pipeline located between Guernsey station and Ft Laramie station:

Belle Fourche must perform an interference study on the Donkey Creek Pipeline between Guernsey station and Ft Laramie station and remediate any stray currents that are found.

As recognized in the Final Order, Belle Fourche conducted a CIS study in 2009. As the Final Order further recognizes, the CIS study specifically addressed possible effects from foreign cathodic protection systems. Final Order at 16 (“BFPL took measures to investigate the stray currents after PHMSA’s inspection . . .”). Nevertheless, the Final Order concludes that it “is not evident from the record that the CIS constituted an interference study.” Final Order at 25. The finding that Belle Fourche investigate stray currents in the CIS cannot be reconciled with the

finding that it did not do an interference study. The CIS *was an interference study. That was among its fundamental purposes.* Indeed, in its Post-Hearing Submittal, PHMSA states that “OPS agrees that the performance of the CIS renders the proposed compliance order unnecessary.” Office of Pipeline Safety Post-Hearing Submittal at 10. Therefore, Belle Fourche requests that the compliance order for this Item be reversed. Because of the potential that a decision on this request will not be rendered until after the deadline to perform another study, and because of the expense and burden of such a study, which has already been done, Belle Fourche also requests a stay of the order. If a stay is not granted, or if the decision is not reversed, then Belle Fourche requests that the Administrator advise Belle Fourche as to what additional CIS or other studies are necessary.

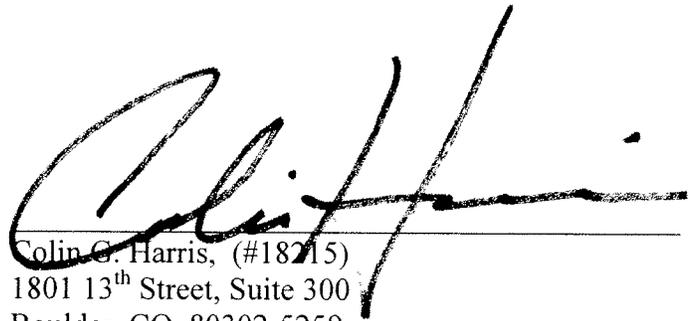
4. The Compliance Order Associated with Item 14 Should be Reversed

Because Belle Fourche has demonstrated that the Finding of Violation for Item 14 should be reversed, the Compliance Order associated with that Item should also be reversed.

Dated this 9th day of December, 2011.

Respectfully submitted,

HOLME ROBERTS & OWEN LLP



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Attorneys for Respondent,
Belle Fourche Pipeline Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 9th day of December 2011, a true and correct copy of the foregoing Petition for Reconsideration was served via **Federal Express Overnight Delivery** as follows:

Jeffrey D. Wiese
Associate Administrator for Pipeline Safety
Pipeline and Hazardous Materials Safety
Administration
East Building, 2nd Floor
1200 New Jersey Avenue, SE
Washington, DC 20590

and by U.S. mail, postage prepaid, to the following:

Chris Hoidal, P.E.
Director of Regional Office
Office of Pipeline Safety
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

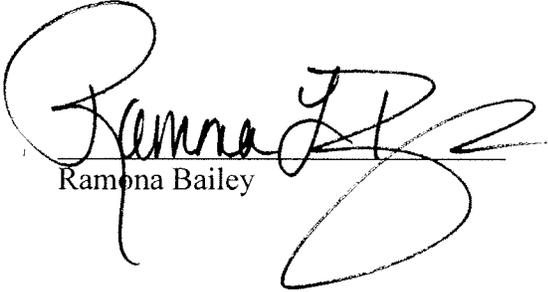

Ramona Bailey

EXHIBIT A

**DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, DC 20590**

In the Matter of)

Belle Fourche Pipeline Company)

Respondent)

CPF 5-2009-5042

AFFIDAVIT OF WILLIAM CARL ("PETE") DOLL

I, William Carl ("Pete") Doll, Affiant herein, having been duly sworn upon oath and having personal knowledge of the facts asserted herein, hereby depose and state as follows:

1. I have worked for Belle Fourche Pipeline Company ("Belle Fourche") doing cathodic protection since 1976. For the five years prior to 1976 I worked for Wyoming Gas also doing cathodic protection.
2. I am currently the Wyoming Corrosion Supervisor for Belle Fourche. I am responsible for ensuring that the Belle Fourche Pipeline System is adequately coated and cathodically protected.
3. Belle Fourche has always had a cathodic protection program to identify, test for, and minimize the detrimental effects of any potential "stray" currents. The survey reports used by the Pipeline and Hazardous Materials Safety Administration ("PHMSA") inspectors, attached as Exhibit J to their Pipeline Safety Violation Report, is conclusive evidence that Belle Fourche implements this program.
4. With respect to Alleged Violation No. 13, the readings did not show "stray" currents because all of the pipelines are tied together with either piping, electrical grounding between the different pipeline companies in the area, or bonds. This creates an electrical path taking any emitted current back to its original source; therefore, these currents are not "stray." The readings that I observed for the 12-inch Donkey Creek Pipeline between the Guernsey Station and Ft. Laramie Station did not show there to be any "detrimental" stray currents.
5. While being interviewed by Jerry Davis with the PHMSA, I told Mr. Davis that the readings he showed (attached to the PHMSA's Pipeline Safety Violation Report as Exhibit J) were not correct because not all rectifiers were interrupted at that time, thus giving higher structure IR readings than if all the rectifiers tied to this line were interrupted. Further, we discussed the fact that there is no regulatory requirement stating that the top limit is 1200 mV (shown as -1.2 under Structure IRF in the above-referenced Exhibit J).

EXHIBIT B

Work Activity Near Pipeline(continued)

- No construction of permanent structures over Company’s pipelines shall be permitted.
- Company shall reserve the right to safeguard its pipelines and other underground facilities by requiring changes in the design for the work if the field conditions indicate that the design proposed by the third party could present a hazard to Company's pipeline facilities.
- Where deemed necessary by Company, cathodic protection test leads shall be installed on the Company's existing pipelines and pipeline being installed by the third party so that any harmful cathodic protection interference can be detected.
- Third party shall notify the One-Call system for the area of excavation to give Company representatives at least 48 hours to mark pipeline ROW’s prior to excavation commencing.
- Third party shall within 60 days of completion of work furnish Company with "as-built" drawings showing the location, depth, and angle of pipelines crossed and the actual amount of clearance between them.
- Should significant work activities be suspected of having an impact on Company's pipeline facilities, the Company shall take action to investigate and/or monitor the integrity of the pipeline. Typical action Company may take to investigate and/or monitor for damage to Company's pipeline facilities are, but are not limited to, excavate and inspect the pipeline, establish a leakage survey program, run internal inspection devices through that section of pipe, and/or perform nondestructive examination on the pipe.

4.8.5

Markers, Pipeline Facilities

Reference: 49 CFR 195.9 and 195.410

Company pipeline systems shall be marked with pipeline markers at selected locations.

Typically, in areas accessible to the public, pipeline markers shall be installed and maintained such that a pipeline marker can be seen along the line of sight in at least one directions along the pipeline system right-of-way.

In addition to the above, pipeline markers should be installed and maintained at the following locations:

- Both sides of U.S. & State highways;
- Both sides of Railroad Crossings;
- One side of County road crossings
- Locations where the pipeline system enters a product delivery or receipt location;
- Company pumping stations and key valve sites;

<p>Monitoring and Inspection (Annual Surveys)</p>	<p>Company shall electrically inspect cathodic protection test stations on each pipeline system once each calendar year, at intervals not to exceed 15 months, to determine the effectiveness of the cathodic protection system. Annual cathodic protection inspections will include electrical inspections of cased crossings, bonds, and electrical isolation devices. Suitable documentation shall be maintained of these inspections.</p> <p>Deficiencies identified during the annual inspection will be remedied prior to the next annual inspection. If circumstances prevent the complete remediation of a deficiency prior to the next annual inspection, Company shall establish a plan to complete the remediation of the deficiency as soon as practicable.</p>
<p>Procedure for CP Readings</p>	<p>Cathodic protection test-readings will be taken by placing the half cell on the soil directly over the pipeline and connecting the wire lead from the volt meter to the test station or pipe. Care must be taken to avoid contact with the copper stud on top of the half cell while taking CP readings since body contact at this point can influence the reading. When the reading is to be taken during a maintenance inspection a steel ice pick can be used to make contact through the coating on the pipe.</p> <p>Note: Always repair any damage done to the coating during inspection.</p>
<p>Corroded Pipe</p>	<p>Pipe found to be corroded to the extent that the remaining wall thickness would reduce the maximum operating pressure per ASME B31G calculations, must be replaced with new pipe of similar specifications or if less than 6 ft in length, repaired with full sleeves. B31G calculations will be done by a qualified engineer or engineering firm. Alternatively, the operating pressure may be reduced, based on B31G calculations based on the actual remaining wall thickness and extent of the corrosion.</p> <p>If corrosion pitting is localized but exists to a degree that leakage might result, the pipe must be replaced or repaired.</p>
<p>Close Interval Survey</p>	<p>Company's Cathodic Protection Technicians will identify areas where a close interval survey is warranted according to the criteria presented in</p>

NACE 01-69, paragraph 10.1.1.3. Areas will include the possibility of stray currents, interference from foreign pipelines, low or variable protection levels. Due to the remote location of its pipelines, Company has experienced very stable and adequate CP levels. ILI inspection tool results have indicated few, if any, external coating failures or CP problems. Areas of high density of foreign lines, HCA's, rocky terrain, and older pipe will be considered for a CI survey.