



Belle Fourche Pipeline
PO Drawer 2360
Casper WY 82602

March 24, 2014

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

RE: CPF No. 5-2014-5001M

Dear Mr. Hoidal,

Belle Fourche is in receipt of your Notice of Amendment and accompanying Warning Letter both dated February 19, 2014. As you may already be aware there were some issues with the addressing of the letter and the mailing of it since it was not postmarked until February 27, 2014 and Belle Fourche did not receive it until March 10, 2014.

In accordance with the direction in the Warning Letter, Belle Fourche will not be responding to the three items identified in it, but will take those items under consideration. The responses below correspond to the items identified in the Notice of Amendment.

Item 1 with regard to § 195.402(a)(c)(9) – Belle Fourche has revised the startup and shut down procedures for the Sussex diesel system and will make additional revisions based on the Notice of Amendment. Belle Fourche will provide those amended procedures for your review within 30 days of this letter.

Item 2 with regard to § 195.402(d)(1)(i-iv) – Belle Fourche contends that the regulation cited does not apply in this case as no design limits were exceeded. As noted in the Notice of Amendment during the initial start up the high pressure switch did shut down the system and as revealed by pressure logs the pressure of the system was not allowed to exceed any design limits. Nevertheless Belle Fourche recognizes the concerns expressed in the Notice of Amendment regarding abnormal operating procedures and attached you will find the latest version (April 2012) of our O&M Procedure 6 – Abnormal Operations.

Item 3 with regards to § 195.402(d)(2-4) – Belle Fourche contends that the regulation cited does not apply in this case as no design limits were exceeded. As noted in the Notice of Amendment during the initial start up the high pressure switch did shut down the system and as revealed by pressure logs the pressure of the system was not allowed to exceed any design limits. Nevertheless Belle Fourche recognizes the concerns expressed in the Notice of Amendment

regarding the lack of specifics in the written procedures. Belle Fourche will provide amended procedures within 30 days of this letter for your review.

Item 4 with regards to § 195.446(a) and (b)(2) – Belle Fourche will provide amended procedures within 30 days of this letter for your review.

Additionally Belle Fourche would like to inform PHMSA that we have implemented additional safety measures to improve the safety on this system. The valve on the mainline that was incorrectly left in the wrong (closed) position is now above grade, behind secure fence, locked and tagged with specific instructions to always leave the valve in the open position. The addition of motor operated valves at Davis Tank and at Hawk Point have given the controllers the ability to control delivery into the respective locations rather than rely on field personnel to manually open or close the valves at issue in this incident. The motor operated valves also give the controllers the ability to shut-in the line when it is shut down. Although the line is still shut in for periods of time, this allows the controllers to maintain some volume in the line while it is down and thus creates a much shorter imbalance period at the point of startup. Attached you will find pictures of the new valve setting at Davis as well as pictures of the motor operated valves at Davis and at Hawk Point as well as a pair of screen shots showing the controllers view of the two motor operated valves.

Feel free to contact me directly at 307-266-0275, if you need any further information or if you have any questions.

Sincerely,



Ken Dockweiler
Director Land Government and Compliance

Attachments

CC: Hank True
Tad True
Manuel Lojo
Colin Harris