Re: Suncor Energy (U.S.A.) Pipeline Warning Letter -- CPF 5-2014-5004W

Dear Mr. Hoidal:


The Letter states that Suncor failed to maintain proper records of the inspection of two mainline valves (a block valve at mile post ("MP") 34.22 and a discharge valve at MP 22.3) at the required 7 ½ month interval. The Letter states that PHMSA decided not to conduct additional enforcement action or penalty assessment proceedings with respect to these allegations, but advises Suncor to correct the item(s) identified. Suncor does not dispute the findings in the Letter, but wishes to provide the following additional information, and to confirm that, as requested, it has taken steps to correct the items identified.

With respect to the block valve at MP 34.22, Suncor notes that the operator marked all the other block valves on the relevant inspection form as operating correctly. As a result, although the operator did not correctly fill out the inspection form as to the block valve at MP 34.22, Suncor believes that the block valve at MP 34.22 was inspected at the proper 7 ½ month interval.

Similarly, with respect to the discharge valve at MP 22.3, the operator marked all the nearby discharge valves as operating correctly. As a result, although the operator did not correctly fill out the inspection form as to the discharge valve at MP 22.3, Suncor believes that the discharge valve at MP 22.3 was inspected at the proper 7 ½ month interval.

To prevent these types of errors from re-occurring, Suncor is conducting a review of its inspection forms to ensure that no inspection form can be closed out unless all of the boxes on the form have been filled out. That review will be completed by June 30, 2014.
Suncor thanks you for your time and attention to this matter. If you have any questions, please contact me (303-227-6157) or LeRoy Haskins (307-775-8101).

Sincerely,

Christina Henderson

Christina Henderson
Suncor Energy (U.S.A.) Pipeline Company