

Todd Tullio  
Manager  
Regulatory Compliance

PHILLIPS 66 PIPELINE LLC  
3010 Briarpark Drive  
P.O. Box 4428  
Houston, TX 77042  
Phone 832-765-1636



July 20, 2015

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

RE: CPF No. 5-2015-5012M

Dear Mr. Hoidal:

This letter is in response to your letter dated June 16, 2015 regarding the Notice of Amendment (NOA) received by Phillips 66 Pipeline LLC (Phillips 66) on June 22, 2015.

By submitting this response, Phillips 66 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.

On the basis of your inspection, PHMSA identified some inadequacies within Phillips 66 procedures, as described below. Phillips 66 responses to the noted inadequacies are below. We have attached procedure updates for your review as well.

**Item 1. §195.402 Procedural manual for operations, maintenance, and emergencies.**

**(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:  
(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

**PHMSA Concern:**

*Phillips 66 Pipeline LLC did not establish adequate written procedures for performing overpressure safety device inspections in accordance with Section 195.428(a). During the inspection, it was determined through discussion with various Phillips 66 operating personnel that the technicians performing overpressure safety device (OSD) inspections are required to check the Operating Data (OD) sheets to identify the correct set point for each OSD device and subsequently record that value on the appropriate OSD inspection form prior to performing the OSD inspections. It was then determined that the procedure and forms for inspecting OSDs were not clear in this regard. As a result, Phillips 66 must modify the following procedures and related inspection forms to clarify the steps necessary for a technician to identify the correct set point for each OSD and to include that set point information on the Phillips 66 OSD inspection forms:*

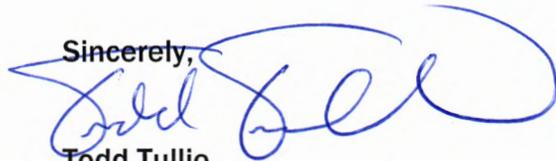
*MPR 4216 Calibration and Maintenance of Pressure Switches  
MPR 4225 Inspection and Maintenance of Pressure Regulation Systems*

**Phillips 66 Response:**

Phillips 66 modified its procedures, MPR-4216 Calibration and Maintenance of Pressure Switches and MPR-4225 Inspection and Maintenance of Pressure Regulation Systems as requested by PHMSA. Phillips 66 has added additional language in both procedures that require field employees to review Operator Datasheets (OD) and document stated set pressures prior to performing field inspections. The instructions to form GPL-122 had already indicated that the field should review the OD sheets prior to performing the inspections. Attached are MPR-4216, MPR-4225 and the instructions for GPL-122.

Please let me know if you have any questions or comments regarding this matter.

Sincerely,



Todd Tullio  
Manager, Regulatory Compliance

CC. Dave Barney/Phillips 66  
Van Williams/Phillips 66  
Todd Denton/Phillips 66  
Manny Cortez/Phillips 66