



05-03-17 P03:28 RCVD

May 4, 2017

By Electronic and Regular Mail

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

Re: CPF 5-2017-6011M

Dear Chris:

I am writing on behalf of Anadarko Petroleum Corporation ("APC") in response to your April 4, 2017 Notice of Amendment letter to Al Walker regarding the Pipeline and Hazardous Materials Safety Administration's ("PHMSA") October 26-30 inspection related to APC's procedures for atmospheric corrosion control, and rectifiers and other devices in Vernal, Utah (CPF 5-2017-6011M). Specifically, this response provides APC's proposed amended procedures for the below alleged violations for PHMSA's review and approval.

PHMSA's alleged violations are listed below (in **bold text**) and are followed with additional information from APC (in plain text).

- I. **Anadarko Petroleum Corporation (APC) did not establish adequate written atmospheric corrosion procedures to give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under bonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water in accordance with §195.583(b). At the time of the inspection, it was noted that the procedure in the APC Manual does not provide sufficient guidance for performing the inspection of aboveground pipelines exposed to the atmosphere, especially pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, or at pipe supports. Therefore, APC must modify their procedure to provide specific details on how to inspect the above ground pipelines for atmospheric corrosion as required by §195.583(b).**

The Anadarko O&M manuals have been updated to reflect these changes. Please find the attached document regarding atmospheric corrosion control, which includes updated procedures to address the above-proposed deficiencies.

- II. **APC did not establish adequate written procedure for performing inspections of rectifiers, interference bonds, diodes, or reverse current switches in accordance with §195.573(c). At the time of the inspection, it was noted that the procedure in the APC Manual on specifies the inspection frequency for checking rectifiers and other devices in accordance with §195.573(c). Therefore, APC must modify their procedure to provide details on how to perform inspections of rectifiers, interference bonds, diodes, or reverse current switches as required by §195.573(c).**

The Anadarko O&M manuals have been updated to reflect these changes. Please find the attached document regarding rectifiers, which includes updated procedures to address inspection frequency of rectifiers, interference bonds, diodes and reverse current switches.

In addition to APC's response and attached proposed amended procedures, I have estimated APC's internal safety improvement costs associated with fulfilling the Notice of Amendment to be approximately \$2,000.00, which includes HSE, Operations Management and Attorney's time to draft, review and amend APC procedures.

APC looks forward to partnering with PHMSA to alleviate any conceived or actual compliance issues. As such, should you have any questions or require additional information regarding APC's response, please feel free to contact Ben Malotte at (720) 929-6732 or benjamin.malotte@anadarko.com.

Sincerely,

Anadarko Petroleum Corporation



Brian K. Moore

HSE Manager

cc: Chris Hoidal, PHMSA
Diana Fehling, PHMSA
Mike DeHerrera, APC
Shon Rhoton, APC
Brian Moore, APC
Terry Gage, APC