



July 20, 2017

**By Electronic and Regular Mail**

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

Re: CPF 5-2017-6024M

Dear Dustin:

I am writing on behalf of Anadarko Petroleum Corporation ("APC") in response to your June 28, 2017 Notice of Amendment letter to Al Walker regarding the Pipeline and Hazardous Materials Safety Administration's ("PHMSA") January 17-19 inspection related to APC's procedures for routine, in-service inspection of steel atmospheric or low pressure breakout tanks, and testing and inspection of overfill devices on aboveground breakout tanks near Wamsutter, Wyoming (CPF 5-2017-6024M). 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 procedures to describe the interval and method for performing routine, in-service inspection of breakout tanks, in accordance with §195.432(b). At the time of the inspection, it was noted that the procedure in the APC Manual only specifies that routine, in-service inspection will be performed on a monthly basis in accordance with Section 6.3.2.1 of API Recommended Practice 510. Therefore, APC must amend their procedure to provide details on how to perform routine monthly, in-service inspection of their breakout tanks. In addition, the procedure must reference a correct API Standard for performing in-services inspection of their breakout tanks.**

The APC O&M Manual has been updated to reflect these changes. The amendment to the O&M Manual now directs the reader to API RP 653, section 6.3.1 which we believe is a more appropriate reference. Please find the attached Monthly Tank Inspection form, which includes updated procedures to address monthly, in-service inspection of breakout tanks.

- II. **Anadarko Petroleum Corporation (APC) did not establish adequate written procedures for requiring adequate testing and inspection of overfill devices on aboveground breakout tanks at the required interval in accordance with §195.428(a). At the time of the inspection, it was noted that the procedure in the APC Manual does not address overfill protection procedures for aboveground breakout tanks. Records that were provided during the inspection for overfill protection reference §195.482(d), which does not exist, and illustrate a procedure that does not correlate to a procedure in the APC Manual. Therefore, APC must amend a procedure(s) to provide details on how to perform adequate testing and inspection of overfill protection on aboveground breakout tanks.**

The APC O&M manual has been updated to reflect these changes, and also directs the reader to site specific procedures. Please find the attached (Wamsutter site specific) Level Switch Testing document, which includes updated procedures to address overfill protection procedures for the aboveground breakout tank. Please note that the old record incorrectly referencing 195.482(d) will be kept, but that particular form is no longer being used. We believe this was an inadvertent typo, which was meant to reference 195.428.

Also attached are the updated portions of the O&M manual referred to above for your review and approval.

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 me at (720) 929-6732 or [benjamin.malotte@anadarko.com](mailto:benjamin.malotte@anadarko.com).

Sincerely,

Anadarko Petroleum Corporation



Benjamin Malotte

Sr. HSE Representative