



**PACIFIC OPERATORS OFFSHORE, LLC**

October 5, 2017

Mr. Huy Nguyen  
Acting Director, Western Region  
PHMSA  
12300 W. Dakota Ave., Suite 110  
Lakewood CO 80228

RE: CPF 5-2017-7003M

Dear Mr. Nguyen,

This is to respond to your letter of October 3<sup>rd</sup> as referenced above. In reply to the two purported identified inadequacies, Pacific Operators Offshore LLC (PACOPS) submits the following in response to PHMSA's alleged findings:

**Item 1 §195.402**

Procedure 14.01 is for valves. Procedure 4.01 is for Scarper and Sphere Facilities. Section 5.5 of Procedure 4.01 specifically states:

Each scraper and sphere facility or other exposed facility must be protected from vandalism and unauthorized entry. The Company will use one or more of the following security techniques at pump stations, breakout tanks, and other exposed facilities.

- Security fencing
- Locks on equipment
- Other options may be used if reviewed and documented and described within the PSOM

PACOPS disputes this alleged finding. Please refer to Procedure 4.01 attached in electronic format and as made available to PHMSA inspecting personnel between February 14, 2017 and April 14, 2017. PACOPS accordingly requests the withdrawal of an Order Directing Amendment.

**Item 2 §195.440**

The PA Program Section 5 and 12 (including Team Charter) specifically address the items listed in the notice.

PACOPS disputes this alleged finding. Please refer to PA Program Sections 5 and 12 attached in electronic format and as made available to PHMSA inspecting personnel between February 14, 2017 and April 14, 2017. PACOPS accordingly requests the withdrawal of an Order Directing Amendment.

Please feel free to contact me in the event you require further information or clarification.

Sincerely Yours,

Clement M. Alberts, Environmental Coordinator