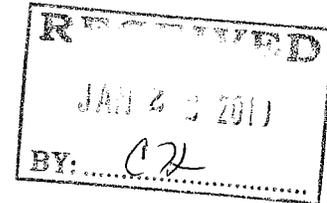




January 21, 2019



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 5-2018-5008M

Dear Chris:

I am writing on behalf of Anadarko Petroleum Corporation ("APC") in response to your December 31, 2018 Notice of Amendment letter to Al Walker regarding the Pipeline and Hazardous Materials Safety Administration's ("PHMSA") August 20 – 24 2018 inspection related to APC's Operator Qualification (OQ) Program in Houston, TX (CPF 5-2018-5008M). Specifically, this response provides APC's proposed amended program 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).

1. **§195.505 Qualification Program**

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a) ...

(c) Allow individuals that are not qualified pursuant to this subpart

Please find the attached OQ Program, specifically section 10, which has been updated to address the above-proposed deficiencies. In observation of ASME B31.Q's recommended span of control limitations, APC will consider a reduction of these recommendations when actual jobsite conditions such as excess noise levels or distance may limit the qualified individual's ability to direct and observe non-qualified personnel.

2. **§195.505 Qualification Program**

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(a)...

(g) Identify those covered tasks and the intervals at which evaluation of the individual's qualifications is needed;...

Please find the attached OQ Program, specifically sections 7 and 8, which has been updated to address the above-proposed deficiencies. Again taking into account ASME B31.Q, the minimum time-frame for re-evaluation upon failure of evaluation has been established (section 8.1), as well as the maximum times an individual will be allowed to attempt the requalification process (section 7.5 and 8.1).

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.

Sincerely,

Anadarko Petroleum Corporation



Benjamin Malotte

Staff HSE Representative

cc: Chris Hoidal, PHMSA
Diana Fehling, PHMSA
Mike DeHerrera, APC
Ronald Speer, APC
Terry Gage, APC