



Cenex Pipeline, LLC • Post Office Box 909 • Laurel, Montana • 59044-0909 • Phone (406) 628-5200

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November 21, 2019

Mr. Dustin Hubbard  
Director, Western Region  
Office of Pipeline Safety  
Research and Special Programs Administration  
12300 W. Dakota Avenue, Suite 110  
Lakewood, Colorado 80228

RE: CPF 5-2019-5009M

Dear Mr. Hubbard,

Pursuant to II a. of the "Response Options for Pipeline Operators in Enforcement Proceedings" Cenex Pipeline, LLC. (Cenex) is not contesting the items in the Notice of Amendment associated with the above referenced CPF.

Cenex submits the following response to the items in the NOA, issued by the Pipeline Hazardous Materials Safety Administration (PHMSA) on October 22, 2019:

- **Item 1 – Abandonment Procedures:** Cenex has attached an updated Operations and Maintenance (O&M) Manual excerpt associated with this item per the attached O&M procedures (Section I Page 52).
- **Item 2 – Cathodic Protection Adequacy and CIS Frequency:** Cenex has attached an updated O&M Manual excerpt associated with this item, per the attached O&M procedures (Section H Page 12).
- **Item 3 – Recordkeeping Procedures for Preventive and Mitigative Measures:** Cenex is in the final stages of developing a new written Integrity Management Program (IMP). A portion of Article 5 from the new IMP (in draft form) is attached for PHMSA's review. Section 5.3 is our description of the Identification and Evaluation Process for New Measures. The final sentence in 5.3 refers to Section 10 of the Annual Program Effectiveness Review so an example of this table showing, planned, completed PMM is also attached. Upon finalization, Cenex will submit the new written program to the PHMSA Information Resources Program Manager and Regional Directors. The anticipated implementation date for the new written IMP program is 12/30/19.

- **Item 4 – Canal Span:** Cenex has been inspecting the canal span in question that is located west of Sidney, MT (Milepost 49) and has been part of CPL's atmospheric corrosion inspection process. A formal inspection of the span was completed on 01/21/2014 and 04/12/2018 as show in the attached Inspection forms (original form) and Atmospheric Inspection Report Cenex Spans page 4 (new PCS form). The Atmospheric Information Report Cenex Spans page 3 shows additional details about the span. Note – The NOA incorrectly referenced the location of this span. The span in question is located just south and west of Sidney, MT.

"Please note that the enclosed documents contain confidential business and/or personnel information that is protected from disclosure under the Freedom of Information Act (FOIA), 5 U.S.C. § 552(b)(4) and (b)(6). Should PHMSA receive a FOIA request for these documents, the Agency is required to notify Cenex and provide the Company an adequate opportunity to substantiate its claim, prepare redactions, and/or object, if warranted."

If you need any further information from Cenex Pipeline, LLC., please contact Michelle Slyder at (406) 628-5293.

Sincerely,



Greg Brown

VP Pipelines and Terminals

C: Michelle Slyder, Manager, DOT Compliance  
Daryl Cram, Manager, Operations Compliance  
Corey McIlvain, Manager, Pipeline Operations