



**Joe Marushack**  
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August 28, 2019

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

**Re: Warning Letter CPF 5-2019-6005W**

Dear Mr. Hubbard:

ConocoPhillips Alaska Inc. ("CPAI") has reviewed the Pipeline and Hazardous Materials Safety Administration's Warning Letter dated July 15, 2019, regarding 49 CFR § 195.452(a)...(k) (What methods to measure program effectiveness must be used) and 49 CFR § 195.208 (Welding of supports and braces).

CPAI appreciates the correspondence and is taking appropriate steps to ensure current and future compliance with 49 CFR § 195.452(a)...(k) and 49 CFR § 195.208.

With respect to 49 CFR § 195.208, CPAI has reviewed the referenced supports in PHMSA's Warning Letter and believes that they are compliant pursuant to Final Rule RIN: 2137-AE36 (Pipeline Safety: Applying Safety Regulations to All Rural Onshore Hazardous Liquid Low-Stress Lines), which took effect on October 1, 2011. Since 49 CFR § 195.208 is non-retroactive for this section of piping constructed prior to the ruling, the referenced supports in the Warning Letter were not in a DOT-Regulated section of piping until Final Rule RIN: 2137-AE36 took effect.

However, CPAI plans to modify the support system for the referenced locations to conform with 49 CFR § 195.208, although this section of piping was not initially designed/constructed to comply with this regulation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Joe Marushack'.

Joe Marushack  
President, ConocoPhillips Alaska, Inc.