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July 16, 2020

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 5-2020-5004W

Dear Mr. Hubbard,

Front Range Pipeline, LLC (FRPL) is submitting the following information in response to the above referenced CPF:

Item #1 - Flange Bolt Torque Inspection Procedures: Per PHMSA's request, FRPL has incorporated written procedures for Flange Bolt Torque Inspections into the O&M Manual (See Attached Page I-45) and the attached OQ procedure (OQ 6-1) and Bolted Flange Assembly and Torque Verification Form. The procedures address flanges that are in-service, new construction, and/or repairs. FRPL procedures include the identification (launcher to receiver), location, and required inspection frequency for the referenced mainline flanges. FRPL established the frequency of inspection based on industry practice and manufacturer's feedback, (i.e., once flanges are torqued per procedure, they do not require ongoing tightness checks or further evaluation).

Item #2 - Inspect Check Valves to the Maximum Extent Practicable: At the time of the next regularly scheduled mainline block valve inspection, FRPL will begin to visually inspect all above ground mainline checks and quantitatively evaluate the operability of pump station check valves via differential pressure readings or arm position indication, when valves are so equipped. Check valve inspection procedures have been added to the O&M procedures (See pages J-18-20) and the attached associated OQ procedure (OQ 2-1). Note – FRPL considered the PHMSA recommendation to modify existing piping to allow for upstream/downstream pressure evaluation, but did not deem it prudent, due to increased leak potential.

If you need any further information from Front Range Pipeline, LLC, please contact myself or Michelle Slyder.

Sincerely,

Greg Brown

Vice President, Pipelines and Terminals, CHS

C: Michelle Slyder
Craig Harms
Corey McIlvain
Daryl Cram