



**PLAINS**  
**PIPELINE, L.P.**

November 09, 2020

Certified Mail No: 7008 1830 0001 6105 7463

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

**Subject: Notice of Amendment CPF 5-2020-5005M  
Plains Pipeline, L.P., Beartooth, Bighorn, and Casper Units**

Dear Mr. Hubbard,

On September 25, 2020, Plains Pipeline L.P. (Plains), received an email with Notice of Amendment (Notice), CPF 5-2020-5005M dated September 25, 2020, from Pipeline and Hazardous Materials Safety Administration (PHMSA) concerning an audit of Beartooth, Bighorn, and Casper Units during 2019. On October 7, 2020, Plains requested a 30-day extension to provide a reply to this Notice, which PHMSA granted in a letter dated October 15, 2020. In the Notice, PHMSA identified apparent inadequacies in Plains' procedures, which are paraphrased for brevity below in ***bold italicized text***, followed with the corresponding Plains response. The enclosure includes excerpted pages from Plains' procedures that were revised to address the apparent inadequacies from the Notice, and the corresponding revised text in those pages were highlighted yellow:

1. ***49 CFR 195.402(c)(3)—Written procedures for span and atmospheric corrosion control inspections are inadequate to assure safe operation of a pipeline facility. Specifically:***
  - ***Form 515—Atmospheric Corrosion Pipeline Inspection is deficient for gathering adequate data for evaluating spans.***
  - ***The procedure for span inspections is not explicit regarding any process for evaluating maximum span lengths, data to be documented, and identification of any immediate hazards that should be addressed in a timely manner.***
  - ***Form 515 fails to specify areas to pay particular attention, which are mentioned in the procedure, to ensure these locations are inspected.***

Plains' Response: As shown on Pages E-1 through E-6 of the enclosure, Plains revised Form 515, the form's instructions, and Section 2.1 of Operations and Maintenance Manual (O&M Manual), procedure titled "Visually Inspect for Atmospheric Corrosion (P-195.583)" to address Notice Item 1.

2. ***§195.402(c)(3)—The Hydrostatic Test Pressure, Validation, and Evaluation Pressure Procedure does not explicitly state that MOP is calculated using the lowest criteria set forth in §195.406, and Section 6.1 of the procedure does not clearly state the provision for using 80***

***percent of the factory hydrostatic test pressure is only valid for pipeline components, not pipe pursuant to §195.406(a)(4).***

Plains' Response: As shown on Pages E-7 and E-8 of the enclosure, Plains revised Section 2 of the procedure titled "Determining Maximum Operating Pressure, Maximum Allowable Operating Pressure and Evaluation Pressure" to address Notice Item 2.

- 3. §195.452(f)(1)—The Facilities Integrity Management Program (FIMP) fails to define the frequency of and the process for identifying high consequence area (HCA)s for facilities, and several steps that are performed in the field are not mentioned in the procedure.***

Plains' Response: As shown on Pages E-10 and E-12 of the enclosure, Plains revised FIMP Section 3.2 to address Notice Item 3.

- 4. §195.452(f)(3)—FIMP Section 4.2 "Data Integration" fails to provide adequate detail to sufficiently describe all available information about integrity, including necessary factors affecting the overall risk and how often risk analysis is performed.***

Plains' Response: As shown on Pages E-12 through E-14 of the enclosure, Plains revised FIMP Sections 4.0 through 4.1.2 to address Notice Item 4.

- 5. §195.452(f)(6)—FIMP Section 10 "Identification of Preventative and Mitigative Measures," when compared to API 1160, Section 12.7, and §195.452(i), is minimal and too broad in scope because the general P&M measures listed in Section 10.3 are insufficient for PHMSA to determine which measures are being considered.***

Plains' Response: As shown on Pages E-15 through E-20 of the enclosure, Plains revised FIMP Sections 5.2, 10.1.3 through 10.3 and Section 2.4 of Appendix A to address Notice Item 5.

- 6. §195.402(c)(3)—Corrosion Control, Section 2.7 Pump Station, uses pipe-to-soil "on" criteria or 100Mv shift criteria; however, the pipe-to-soil "on" criteria does not adequately consider IR drop, and there is no statement consistent with NACE SP 0169, incorporated by reference for § 195.571 and §195.573(a).***

Plains' Response: As shown on Pages E-21 and E-22 of the enclosure, Plains revised Section 2.7.2 of O&M Manual document titled "Corrosion Control" to address Notice Item 6.

Mr. Dustin Hubbard  
November 09, 2020  
Page 3

We appreciate the opportunity to correct the apparent inadequacies to our procedures, and trust this submittal addresses them satisfactorily. Should you have any questions you may contact me directly at 713-646-4452, email at [PDHodgins@paalp.com](mailto:PDHodgins@paalp.com) or contact Kevin Cunningham by email at [KHCunningham@paalp.com](mailto:KHCunningham@paalp.com), or call 713-993-5568.

Sincerely



Patrick D. Hodgins  
Vice President, Health, Safety, & Environmental

Enclosure

cc: Erol Alavi, Plains  
Henry Cordova, Plains  
Kevin Cunningham, Plains  
Ngiabi Gicuhi, Plains  
Sandra Tasso, Plains  
Sherri Adkins  
Todd Smith,  
File