



July 27, 2020

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Shell Pipeline Company LP
Woodcreek Bldg A-2nd floor
150 Dairy Ashford Road
Houston, Texas 77079

SUBJECT: Notice Of Amendment CPF 1-2020-5011M

Dear Mr. Burrough:

From April 9, 2019 to April 11, 2019, an inspector from your office performed an inspection of the procedures associated with the design and construction of the Falcon Pipeline System. On July 21, 2020 we received a Notice of Amendment citing four areas of apparent inadequacies found in our plans and procedures. We constantly strive to have the best plans and procedures possible and appreciate the feedback from this inspection. This letter is the response to the Notice of Amendment.

Item 1: 49 CFR 195.206 requires pipe and components to be visually inspected at the site of installation to ensure that it is not damaged in a way that could impair its strength or reduce its serviceability.

Shell Pipeline takes pride in performing inspections of pipe and components every step of the way, from pipe mill visits to a final jeeeping before pipe is backfilled and then again with the post construction hydrotest. The requirement for a visual inspection of material at the site of installation is an assumed duty of both site inspectors and the contractor personnel but it was not specifically stated as written in the regulation at the time of the inspection. Document 40TS-002, Onshore Pipeline Construction has been updated to explicitly specify this requirement. See Attachment A for a copy of the page of this document that contains this requirement.

Item 2: 49 CFR 195.210 has specific requirements around route selection to avoid private dwellings, industrial buildings, and places of public assembly and to include extra cover if those places cannot be avoided entirely.

Shell Pipeline utilizes ISO 13623:2017 Pipeline Engineering as the base standard for Pipeline Design with a cover document that adds to or modifies the requirements of the ISO document as necessary. While the ISO document does cover risk reduction in site selection, it does not contain the specific locations and depth of cover requirements exactly as contained in 49 CFR 195.210. The cover letter did not address this at the time of the inspection, but wording was added after this concern was brought up to cover this requirement. See Attachment B for the added wording.

Please note that while the procedure did not call out this specific wording, location of people, businesses, and places of congregation were carefully considered in route selection and care was taken

to select a route that minimized impact to people and the environment. The pipeline was routed to avoid population where possible, understanding that Falcon did not use eminent domain and so was somewhat constrained to landowners that would allow the pipeline on their property and to where the landowners wanted the pipeline to go. Most of the pipeline route is through rural areas but where the route does get closer to populated areas or areas of higher environmental concern, individual site analysis was performed to minimize impacts both during construction and operation. Also, Falcon increased the depth of cover from the DOT required minimum 3' depth of cover to a minimum of 4' depth of cover over the entire length of the pipeline and increased the amount of remote operated shutdown valves on the line so that they are approximately 7-1/2 miles apart, which added more valves on the line than required by DOT to minimize impact should there be an issue.

Item 3: 49 CFR 195.206 requires that items be visually inspected at the site of installation. This item associated this requirement with inspection of coating on an HDD after pullback of the drill string. Shell's procedure for HDDs did not specify what to do in the event there is coating damage on the HDD drill string.

Shell Pipeline's 40TS-003 Horizontal Directional Drilling addressed the need to jeep the drill string after pull back but did not go into specifics of response to damage because of the unique characteristics of each drill. Coating damage beyond the second joint on an HDD pullback is reviewed by corrosion specialists to determine what the specific reaction should be for the unique circumstances of that drill. However, it was recognized that basic guidance should be included for those circumstances where there is damage to the coating. Wording around immediate installation of the CP system or an anode was added to the Technical Specification to provide general guidance in the event there is coating damage beyond the second joint. See Attachment C for a copy of the language that was added to the specification.

Item 4: One of Shell's welding procedures did not record the maximum allowable time between passes.

The omission of the maximum allowable time between passes on one of the weld procedures was an oversight that was not caught when the procedure was reviewed and approved. This procedure had not yet been used on the project and the time between passes was added to the procedure and it was routed through the approval process again the same day that it was pointed out by the inspector. A copy of the corrected procedure is attached in Attachment D.

We hope that the amendments that have been made to our procedures adequately address the concerns of the NOA. If you have any questions regarding this response or need any additional information, please contact me at (832) 762-2553.

Sincerely,



Deborah Price
Integrity & Regulatory Services Manager
Shell Pipeline Company LP

Attachments