



Randy Beggs
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April 25, 2007

Ivan Huntoon
Director, Central Region
Pipeline Hazardous Materials Safety Administration
901 Locust, Room 462
Kansas City, MO 64106-2641

RE: CPF No. 3 -2007-50014M

Dear Mr. Huntoon

This letter is in response to the Notice of Amendment, received by ConocoPhillips Pipe Line Company (CPPL) on March 27, 2007.

Amendment of Procedures:

- 1.(a) **\$195.406 Maximum Operating Pressure.**
 - (b) **No operator may permit the pressure in a pipeline during surges or other variations from normal operations to exceed 110 percent of the operating pressure limit established under paragraph (a) of this section. Each operator must provide adequate controls and protective equipment to control the pressure within the limit.**

ConocoPhillips Pipe Line Company response:

It appears that the your office has concerns regarding CPPL's procedure that allows the use of a SCADA administrative control set point and/or alarm for managing a temporary pressure deration of an IMP repair condition until it can be remediated. Specifically, CPPL allows an administration control for 90 days and you feel that we should limit the use of administrative controls to 30 days. We are somewhat confused by this sudden concern over CPPL's deration procedure since the procedure was reviewed and determined to be adequate by PHMSA during the 2003 and 2005 Integrity Management comprehensive audits which included participants from the Central Region. Attached are the documents that indicate acceptance of CPPL's procedure and listed below is a summary or excerpt from the documents:

- CPF 3-2004-5013: Item 6B required revision to Appendix K of CPPL's IMP and the revisions were accepted by your office in a letter dated February 15, 2007. The required revision was not regarding our use of the 90 days administrative control.
- PHMSA stated in the ConocoPhillips Pipe Line IMP Inspection Summary Report on August 8, 2005 the following: "The IE follows MPR-4104, Derating a Pipeline to a Lower Operating Pressure for operating pressure reductions or shutdowns for immediate repair conditions. This procedure provides a consistent approach for implementing a pressure reduction or shutdown after an assessment of the ILI tool vendor's preliminary or final report."

The use of administrative controls for 90 days has been successfully used by CPPL in managing the continued safe operations of the pipeline for IMP repair conditions. While CPPL agrees that limits should be place on administrative controls, CPPL believes that a 90 day limit provides a reasonable approach to providing adequate controls to manage pressure derations. It would appear the audit team members in our last 2 IMP audits felt the same.

If it would help in resolving your concerns over this matter, we would be pleased to make a visit to your office. Please feel free to contact me to discuss further or schedule a visit.



Randy Beggs
ConocoPhillips Pipe Line Company
Attachments

cc:
File
M. Drumm
T. Fuksa
C. Hill
M. Miller