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December 19, 2025

Bryan Lethcoe
Director, Southwest Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

RE: CPF 4-2025-008-NOA

Mr. Lethcoe,

On December 2, 2025, Shell Pipeline Company LP received a Notice of Amendment CPF 4-2025-008-NOA from a review of our Corrosion Control Inspection and Maintenance Manual which took place as part of an Integrated Inspection that spanned from February 24 to June 13, 2025. Below is Shell's response to the Notice of Amendment.

NOA Item 1: 1. § 195.402 Procedural manual for operations, maintenance, and emergencies.

> **(a) . . . .**
>
> **(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:**
>
> > **(1) . . . .**
> >
> > **(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**
>
> **§ 195.571 What criteria must I use to determine the adequacy of cathodic protection?**
>
> **Cathodic protection required by this Subpart must comply with one or more of the applicable criteria and other considerations for cathodic protection contained in paragraphs 6.2 and 6.3 of NACE SP 0169 (incorporated by reference, see § 195.3).**

PHMSAs Allegation:

SPLC's written procedures for conducting operations and maintenance activities, specifically corrosion control, were inadequate to provide for safe operation of a pipeline facility in accordance with § 195.402(c)(3). Specifically, SPLC's Corrosion Control Inspection and Maintenance Manual (09/01/2024), and SPLC's 27TG-007 Field Testing on Cathodically Protected Pipelines and Tanks (05/2024), procedures are too general and lack detailed guidance on calculating and applying the target potential to determine the adequacy of cathodic protection in situations where current on the pipeline cannot be interrupted, in accordance with § 195.571.

Section 5.4.1 of 27TG-007 Field Testing on Cathodically Protected Pipelines and Tanks states that for measuring structure-to-electrolyte potentials to determine the adequacy of cathodic protection, the measured potential "may be either a direct measurement of the polarized potential or a current applied potential. Interpretation of the current-applied measurement requires consideration of the significance of voltage drops in the earth and metallic paths." Paragraph 2 of Section 5.4.1 of 27TG-007 further states that "there are situations where all the current on the pipeline may not be interrupted. In these cases, the IR must be accounted for in the measurement. The most common application of this is with the use of a Target Potential. An interrupted survey is taken on average of every 3 years and used to calculate what the potential shift would be required to maintain the -850 polarized potential criterion." The procedure provides neither a definition for the term "target potential" nor a methodology or process for calculating the target potential, which is used to measure structure-to-electrolyte potential when current to the pipeline cannot be interrupted.

Therefore, PHMSA proposes that SPLC revise its manual of written procedures to include the definition of a target potential, as well as specific actions for calculating and applying target potentials when measuring current applied structure-to-electrolyte potentials.

Shell's Response:

We appreciate the notice and agree there could be details on the application of the target potential more readily available in the Corrosion Control Inspection and Maintenance (I&M) manual. Currently this guidance is contained and detailed within the American Innovations PCS software manual, but it will make the guidance easier to find if incorporated into the I&M manual. We will extract the information from the software manual, add pertinent details, and include an update to "include the definition of a target potential, as well as specific actions for calculating and applying target potentials when measuring current applied structure-to-electrolyte potentials" in the next I&M manual update. Revisions for this update are currently underway with a planned publication date of May 2026.

Shell appreciates this suggestion to make our Corrosion Control procedures more effective. If there are any questions or concerns about the path forward let us know.

Sincerely,

Debbie Price

Debbie Price
Integrity and Regulatory Manager
Shell Pipeline Company LP