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June 16, 2025

Bryan Lethcoe
US Dept of Transportation
Pipeline and Hazardous Materials
Safety Administration
8701 S. Gessner
Suite 630
Houston, TX 77074

Re: CPF 4-2025-048-NOA

Dear Mr. Lethcoe,

This letter is in response to PHMSA's May 21, 2025 Letter regarding a Notice of Amendment for the February 6 to May 22, 2024 inspection of DCP Midstream's procedures. As an equity owner in DCP Midstream, LP ("DCP"), Phillips 66 Pipeline LLC ("Phillips 66") began providing operating services to DCP in April 2023. As a result, Phillips 66 is submitting this response.

PHMSA Item #1 §192.605 Procedural manual for operations, maintenance, and emergencies

DCP's procedures, P66-TSD-3009 Pipeline Anomaly Worklist Selection Criteria (Rev. 4; Effective Sept 29, 2023 and Pipeline Repair and Lowering (Feb 3, 2021) failed to include procedures for general repair requirements in §192.771(c) if a condition that could adversely affect the safe operation of a pipeline is discovered, in accordance with §192.710(f).

PHMSA proposes that DCP amend its procedures to include the requirements in §192.711(3), where applicable, if a condition that could adversely affect the safe operation of a pipeline is discovered in accordance with §192.710(f).

Phillips 66 Response:

Phillips 66 maintains that the requirement of 192.711(c) was sufficiently addressed at the time of the inspection. Appendix A, Table 4 of DCP's Pipeline Repair and Lowering required practice (Feb. 3, 2021) provides a table of acceptable gas pipeline repair methods and does not include welded patches in the list of acceptable repairs, thereby prohibiting their use. DCP believes this table meets the intention of the code and that it is not necessary to repeat the code section verbatim to meet its requirements.

Additionally, after the PHMSA inspection, DCP adopted the Phillips 66 Gas Operations and Maintenance Manual as a shared safety program in November 2024. Included in Phillips 66's manual, procedure P66-GOM-5505 Steel Pipeline Repairs (Jan. 6, 2025), Section 7.1.6,

specifically addresses the repair requirement at 192.711(c). P66-GOM-5505 Steel Pipeline Repairs (Jan. 6, 2025) is included as an attachment to this response.

PHMSA Item #2 §192.605 Procedural manual for operations, maintenance, and emergencies

DCP's procedure Gas Pipeline O&M Manual M-04 DOT Record Keeping (Rev. Oct.12, 2023) failed to require the retention of all records under paragraphs (1) to (19) of §192.712(g).

PHMSA proposes that DCP amend its written procedures for requiring record keeping including all required records to be maintained for the life of the pipeline in accordance with §192.712(g).

Phillips 66 Response:

After the PHMSA inspection, DCP adopted Phillips 66's Gas Integrity Management Program as a shared program effective October 2024 which includes Phillips 66's Asset Integrity IPL-002 Documentation and Communication Plan. Section 5.1 of IPL-002 Plan addresses retention of all required records referenced in §192.712(g) in the plan. P66 IPL-002 is included as an attachment in this response.

Upon your review and acceptance, Phillips 66 requests the closure of this Notice of Amendment. Please let me know if you need any additional information or if I can be of any further assistance.

Best Regards,



Doug Sauer
Vice President, Pipeline Regulatory Affairs
Phillips 66 Pipeline LLC

CC: Bill Johnson, President DCP Midstream, LP and President Phillips 66 Pipeline LLC