



Shell Pipeline Company LP

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June 3, 2026

Rod Seeley
Acting Director, Southwest Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

RE: Response to CPF 4-2026-014-NOPV

Mr. Seeley,

On May 15, 2026, Shell Pipeline received Notice Of Probable Violation CPF 4-2026-014-NOPV concerning an investigation of an Integrity Management Notification submitted by Shell Pipeline on April 6, 2023 concerning an In-Line Inspection (ILI) reported top side dent on the Houma to Capline Pipeline. In this NOPV there were two alleged violations:

- 1. Shell failed to notify PHMSA that it could not meet the schedule for evaluation and remediation required under § 195.452(h)(3) and could not provide safety through a temporary reduction in operating pressure in accordance with § 195.452(h)(1)(i). Specifically, Shell failed to notify PHMSA that it was unable to meet the schedule to remediate a top side dent that Shell determined to be a 180-day condition and failed to state that it could not provide safety through a temporary reduction in operating pressure.*

Regarding this alleged violation, Shell acknowledges a gap in the tracking and timely completion of anomaly remediation activities within its Integrity Management Program. Shell has implemented targeted enhancements, including strengthened controls for prioritization, tracking, and escalation of repair activities, as well as defined requirements to ensure timely communication with PHMSA when regulatory timelines cannot be met.

2. *Shell failed to complete remediation of a condition according to a schedule prioritizing the conditions for evaluation and remediation and failed to offer a reasonable explanation of how the changed schedule would not jeopardize public safety, in accordance with § 195.452(h)(3).*

Shell acknowledges that the anomaly evaluation was not completed prior to the identified response date. However, Shell performed a structured evaluation of the reported dent condition to determine whether continued operation until excavation would jeopardize public safety or environmental impact. This evaluation considered potential failure mechanisms including fatigue, crack interaction, gouging, and metal loss, as well as the potential consequences of a release.

Based on integrated ILL data, third-party SME review, and conservative fatigue analysis incorporating a factor of 10 safety margin, no crack-like or injurious interacting defects were identified, and the probability of failure during the extended timeframe was determined to be extremely low.

Operating conditions remained stable and within established limits throughout this period, and no abnormal operating or monitoring conditions were observed. Based on this assessment, Shell determined that continued operation without pressure reduction would not jeopardize public safety or environmental protection during the period required to obtain necessary permits and complete remediation.

Shell takes safety and regulatory compliance seriously and has implemented targeted enhancements to its Integrity Management Program to strengthen reported anomaly tracking, evaluation, and timely communication, including explicit consideration of public safety and environmental impact in schedule deviations. Shell remains committed to continuous improvement and full compliance with 49 CFR Part 195. Please contact us if additional information or clarification is required.

Sincerely,

Deborah Price

Debbie Price
Integrity and Regulatory Manager
Shell Pipeline Company LP