



**ConocoPhillips
Pipe Line Company**

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Mr. Chris Hoidal, P.E.
Director, Western Region
Pipeline Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, CO 80228

SENT TO COMPLIANCE REGISTRY
Hardcopy Electronically
of Copies 1 / Date 8.23.09

RE: CPF No. 5-2008-5040M

Response of ConocoPhillips Pipe Line Company
To Notice of Amendment

Dear Mr. Hoidal,

This letter constitutes the response of ConocoPhillips Pipe Line Company (CPPL) to the October 15, 2008 Notice of Amendment (NOA) regarding an inspection of CPPL's Integrity Management Plan (IMP) conducted in Ponca City, Oklahoma, on May 13-19 and June 2-5, 2008. CPPL received the NOA on October 20, 2008 and the Final Order on June 24, 2009. This response will address the additional items that the Western Region office found needing further amendment.

By submitting this response, CPPL does not waive any right, privilege or objection that it may have in any separate or subsequent proceeding related in any way to the information provided in this response.

Item 1: CPPL has modified the existing procedure to provide sufficient guidance regarding how to collect the data for a pipeline that may or may not be susceptible to stress corrosion cracking through CPPL's screening process. Along with that we have updated this process to show guidance regarding how often data is to be collected.

Item 2: A corrosion checklist process has been developed and implemented that enables CPPL to identify specific portions of the system that represents the highest risk to each HCA.

Item 2B: PHMSA has stated that the inadequacies outlined in the Process Hazardous Analysis Program (PHA) have been corrected and no further action is required for item 2B.

CPPL considers the information in the attached response to be business confidential and proprietary and requests that the Agency maintain it as such.

Notice of Amendment States:

1. §195.452 Pipeline integrity management in high consequence areas.

(e) What are the risk factors for establishing an assessment schedule (for both the baseline and continual integrity assessments)?

(1) An operator must establish an integrity assessment schedule that prioritizes pipeline segments for assessment (see paragraphs (d)(1) and (j)(3) of this section). An operator must base the assessment schedule on all risk factors that reflect the risk conditions on the pipeline segment. The factors an operator must consider include, but are not limited to:

(i) Results of the previous integrity assessment, defect type and size that the assessment method can detect, and defect growth rate;

(ii) Pipe size, material, manufacturing information, coating type and condition, and seam type;

(iii) Leak history, repair history and cathodic protection history;

(iv) Product transported;

(v) Operating stress level;

(vi) Existing or projected activities in the area;

(vii) Local environmental factors that could affect the pipeline (e.g., corrosivity of soil, subsidence, climatic);

(viii) geo-technical hazards; and (ix) Physical support of the segment such as by a cable suspension bridge.

(2) Appendix C of this part provides further guidance on risk factors

Item 1, CPPL's revised written procedures provide sufficient guidance regarding how to collect the data for the pipeline that may or may not be susceptible to stress corrosion cracking from the CPPL screening process, but fail to provide appropriate guidance regarding how often data is collected. The procedures do not specify the need to perform magnetic particle testing (MPI) or collect appropriate data on all digs resulting from the Magnetic Flux Leakage (MFL) and Deformation surveys and Part 195.452 (h)(4) remediation requirements. Your company's process should include a method to collect the data and/or perform MPI during each exposed pipe evaluation.

Response to item 1

- **Program/Procedural changes:** Provide below are the changes that you will find highlighted in Integrity Management Procedure 05M. In order to provide additional screening for indications of SCC beyond the non-destructive testing outlined for identified crack fields, this process requires that all dents being excavated as part of the IMP program are inspected for indications of SCC through magnetic particle or dye penetrant inspection. Additional metal loss anomalies will be inspected on all pipeline assessment segments which have IMP required excavations regardless of the SCC susceptibility ranking. CPPL TAD – 7011, Line Pipe External Stress Corrosion Cracking Threat Assessment and Mitigation Program, is the process used to manage Stress Corrosion Cracking.

Pipeline Segments which have been identified as susceptible to SCC. History of failure due to SCC or a current crack tool data indicates feature that could be SCC.

- Evaluation of crack fields:
 - Perform CIS (close interval survey) of area (minimum 1500 ft run-in and run-out).
 - Collect photos of each location.
 - Perform the following tests – coating condition ranking, pH under coating, magnetic particle/dye penetrant testing, soil pH, pipe to soil potential, and field metallography of confirmed crack fields.
 - Perform either phased array TOFD (Time of Flight Diffraction) or grind out crack field to determine type and size.

Pipeline Segments which have been identified through screening process as susceptible, but no history of SCC failures or no crack field anomalies identified from a current or previous ILI crack tool data.

- Identify locations with highest stresses and susceptible coating type:
 - Because of the potential for high local stresses and coating damage in dents, all dents in HCA's will be inspected for cracks by magnetic particle or dye penetrant methods. Because dents tend to be randomly distributed along the pipeline, this inspection will provide additional screening for indications of SCC for the pipeline system.
 - Additionally, a minimum of three additional metal loss anomalies which have IMP required excavations in the assessment segment will be inspected for cracks as part of CPPL's current MFL/Caliper inspection program (specifically target areas with prior failure history, high stress areas, low corrosion levels).
 - Perform coating condition ranking, pH under coating, magnetic particle/dye penetrant testing, soil pH, pipe to soil potential. Field metallography, phased array or grinding will only be required if cracks are found.
 - If crack fields are found at an excavation, correlate data with ILI data and inform ILI vendor for re-analysis of data.
 - If crack fields are found at an excavation, consult with Corrosion Engineer to identify three additional anomalies for excavation/evaluation with similar characteristics/environment as found at crack locations.

Pipeline Segments not susceptible to SCC based on CPPL Screening Process:

- Identify locations with highest stresses and susceptible coating type
 - Because of the potential for high local stresses and coating damage in dents, all dents in HCA's will be inspected for cracks by magnetic particle or dye penetrant methods. Because dents tend to be randomly distributed along the pipeline, this inspection will provide additional screening for indications of SCC for the pipeline system.
 - Additionally, a minimum of three additional metal loss anomalies which have IMP required excavations in the assessment segment will be inspected for cracks as part of CPPL's current MFL/Caliper inspection program (specifically target areas with prior failure history, high stress areas, low corrosion levels)
 - Perform all tests listed above except field metallography, phased array or grinding is only required if crack fields are found.
 - If crack fields are found at excavations, correlate data with ILI data and inform ILI vendor for re-analysis of data.
 - If crack fields are found at excavations, consult with Corrosion Engineer.

- Based upon outcome of examinations, revise susceptibility ranking of pipeline segment for SCC.
- Schedule ILI crack tool or hydrotest as appropriate.
- Pipeline segments will be re-assessed for SCC threats a minimum of every five years.

2. §195.452 Pipeline integrity management in high consequence areas.

(f) What are the elements of an integrity management program? An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program:

- (1) A process for identifying which pipeline segments could affect a high consequence area;*
- (2) A baseline assessment plan meeting the requirements of paragraph (c) of this section;*
- (3) An analysis that integrates all available information about the integrity of the entire pipeline and the consequences of a failure (see paragraph (g) of this section);*
- (4) Criteria for remedial actions to address integrity issues raised by the assessment methods and information analysis (see paragraph (h) of this section);*
- (5) A continual process of assessment and evaluation to maintain a pipeline's integrity (see paragraph (j) of this section);*
- (6) Identification of preventive and mitigative measures to protect the high consequence area (see paragraph (i) of this section);*
- (7) Methods to measure the program's effectiveness (see paragraph (k) of this section);*
- (8) A process for review of integrity assessment results and information analysis by a person qualified to evaluate the results and information (see paragraph (h)(2) of this section).*
- (g) What is an information analysis? In periodically evaluating the integrity of each pipeline segment (paragraph (j) of this section), an operator must analyze all available information about the integrity of the entire pipeline and the consequences of a failure. This information includes:*
 - (1) Information critical to determining the potential for, and preventing, damage due to excavation, including current and planned damage prevention activities, and development or planned development along the pipeline segment;*
 - (2) Data gathered through the integrity assessment required under this section;*
 - (3) Data gathered in conjunction with other inspections, tests, surveillance and patrols required by this Part, including, corrosion control monitoring and cathodic protection surveys; and*
 - (4) Information about how a failure would affect the high consequence area, such as location of the water intake.*

Item 2: §195.452(f)(3)&(g)

Item 2.A. CPPL must complete the process for the corrosion checklist and submit the process for review.

Response to Item 2A

CPPL has developed a process and checklist (Evaluation of Pipeline Corrosion Protection Effectiveness) that will identify the corrosion mechanisms that represents the highest risk to high consequence areas.

CPPL believes that the additional action items will help to insure that SCC is being managed. CPPL respectfully submits that with the implementation of the actions described above, the action items specified in CPF No. 5-2008-5040M have been completed, subject to concurrence of the Western Region.

If you or anyone in your staff have questions about the information that has been provided please contact myself or Mike Miller at 832-379-6214.

Sincerely,



Todd Tullio
Manager, Regulatory Compliance

CC. Huy Nguyen
Mark Drumm
Mike Miller
Van Williams

Attachments: For your convenience we have highlighted the areas in these documents to reflect the changes made to address this NOA.

IMP Appendix 05M
CPPL-TSD 8000
Checklist for Evaluation of Pipeline Corrosion Protection Effectiveness