

August 10, 2017

Huy Nguyen, Acting Director
Western Region
Pipeline and Hazardous Material Safety Administration
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

RE: CPF 5-2017-5012W

Dear Mr. Nguyen:

On July 12, 2017 Calnev Pipe Line LLC (Calnev) received your Warning Letter dated July 6, 2017 (incorporated herein by reference) resulting from PHMSA's inspection of Calnev's pipeline system in southern California and Nevada. The letter alleges probable violations of 49 CFR Part 195.402 for not following its written procedures for Inspection and Servicing Pipeline Valves (L-O&M 301) and Inspecting, Testing and Maintenance for Fire Protection Systems and Features (L-O&M 112). For the reasons set out below, Calnev objects on the record to both the procedural and substantive elements of the Warning Letter, and respectfully requests that the Warning Letter be withdrawn.

Calnev Response - Item #1

Your letter alleges that Calnev did not follow its written procedures for conducting mainline valve inspections. Specifically, you allege that because each item from procedure L-O&M 301 (Inspecting and Servicing Pipeline Valves) was not explicitly listed on the inspection from (L-OM300-03), that the procedure was not followed. We find this allegation to be totally unfounded. We conducted the inspections, including checking the signs, ensuring the emergency phone numbers were posted at each valve site, and checking for excess vegetation that would prevent safe operation of the valves and provided the documents to your inspector. Further, during the very thorough field evaluation conducted by the PHMSA inspector, no such non-compliant conditions were discovered. Calnev's operations and maintenance personnel are qualified (per its OQ Program) to follow L-O&M 301. Further this procedure is reviewed annually not exceeding 15 months to insure its effectiveness. Calnev sees no reason to add these three items to its form L-OM300-03, and therefore objects to this warning item.

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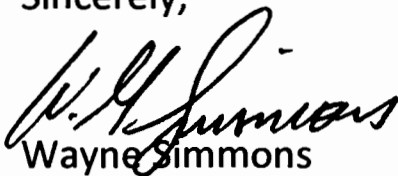
Calnev Response - Item #2

Calnev agrees that its personnel did not properly or timely punch the tags at the remote Cajon Pump Station due to a punch not being available at that site. Calnev has purchased additional punches to keep at each remote site to ensure the inspections are properly documented. For the record, Calnev did provide evidence that the extinguishers were actually inspected per the procedures, as noted in footnote 2 of your letter, but were not always documented properly by punching the metal tags. Therefore, Calnev objects to this warning item.

We are attaching appropriate documents (originally sent to your inspector at the time of the inspection), addressing our position as described for Item #1 and Item #2. After you have had the opportunity to review these records, Calnev respectfully requests that you rescind the Warning Letter in its entirety.

We appreciate the opportunity to provide this additional information. Calnev is committed to protecting people, to protecting the environment, and to complying fully with the regulations. If you have any questions, do not hesitate to call Buzz Fant at 713 369-9454 or me at 713 420-6330. In addition, we would be happy to meet with you at your office to discuss this matter, answer any questions you might have, and provide any additional information that you might find helpful.

Sincerely,



Wayne Simmons
Chief Operating Officer, Products Pipelines

Enclosures (5)

Attachments:

Valve Inspection Procedure – L-O&M 301



L_Procedure_301_ValveInsp.pdf

Weekly Facility Inspections showing the inspections were done and documented.



Remote Facility

Inspection_Cajon Box



Remote Facility

Inspection_Cajon Box



Remote Facility

Inspection_Cajon Box