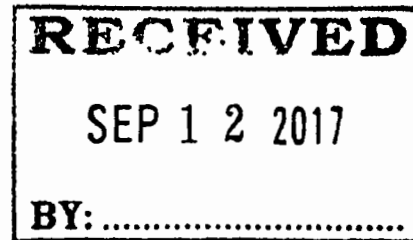


Todd Tullio
Manager, Regulatory Compliance

PHILLIPS 66 PIPELINE LLC
S820-05 Headquarters
1075 W. Sam Houston N., Ste. 200
Houston, TX 77043
Phone 832-765-1636



September 5, 2017

Dustin Hubbard, Acting Director, Western Region
Pipeline Hazardous Materials Safety Administration
12300 West Dakota Ave, Suite 110
Lakewood, CO 80228

RE: CPF No. 5-2017-5014W

Dear Mr. Hubbard:

Between August 10, 2016 and August 25, 2016, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), inspected pipeline systems from Douglas, Wyoming to Borger, Texas.

This letter is in response to the Warning Letter dated 06/27/2017 issued by the U.S. Department of Transportation Pipeline Hazardous Materials Safety Administration (PHMSA) and received by Phillips 66 Pipeline LLC (Phillips 66) on 07/11/2017.

By submitting this response, Phillips 66 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. Phillips 66, by this response letter and the attachments contained herein, submits the requested information as found in the Letter of Concern:

Warning Letter Item 1: §195.404 Maps and records.

(c) Each operator shall maintain the following records for the periods specified:

(3) A record of each inspection and test required by this subpart shall be maintained for at least 2 years or until the next inspection or test is performed, whichever is longer.

PHMSA Concerns:

During the records review of the Power River HVL pipeline system, Phillips 66's (P66's) overpressure protection records failed to demonstrate that they

are in compliance with §195.428(a). It was noted that the maximum discharge and the maximum operating pressure (MOP) for the CO Pump Station is 1315 psig. However, the September 2015 overpressure protection record for CO Pump Station Discharge Controller calibration indicated 1315 psig "as found" and 1355 psig "as left". Interviews with P66 personnel revealed that the "as left" pressure for the CO Pump Station was 1315 psig, and this was confirmed with the March 2016 inspection record.

In addition, the Pressure/Temperature Device Inspections for the KE (HVL) Station were performed on March 9, 2016 for six (6) devices. In accordance with P66PL-GPL- I 22 procedure, the overpressure safety devices include the Discharge Transmitter, Hi Discharge Shutdown, Max Discharge Setpoint, Discharge Switch, Suction Transmitter, and Control Valve. During the records review of the overpressure safety devices for KE Station, six (6) overpressure device inspection records were not completed in their entirety, i.e. Product Service HVL, Non-HVL, or Gas; "Block Valves Sealed Open (Y, N, N/A)"; and "Operational & Mechanical Condition."

Phillips 66 Response:

Phillips 66 has corrected the items listed above. Phillips 66 has performed additional training on GPL-122. The training was to provide the importance and to understand the liability of completing a GPL- 122 correctly. Training was scheduled and completed on 3/10/2017.

Please let me know if you have any questions or comments regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd Tullio', with a stylized flourish at the end.

Todd Tullio
Manager, Regulatory Compliance

CC. Jeff Graff/Phillips 66