



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 28, 2017

Mr. Al Walker
President
Anadarko Petroleum Corporation
1201 Lake Robbins Drive
The Woodlands, TX 77380

CPF 5-2017-6024M

Dear Mr. Walker:

On January 17 through 19, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Anadarko Petroleum Corporation procedures for routine, in-service inspection of steel atmospheric or low pressure breakout tanks, and testing and inspection of overfill devices on aboveground breakout tanks in Wamsutter, Wyoming.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Anadarko Petroleum Corporation's plans or procedures, as described below:

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:
(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

Anadarko Petroleum Corporation (APC) did not establish adequate written procedures to describe the interval and method for performing routine, in-service inspections of breakout tanks, in accordance with §195.432(b). At the time of the inspection, it was noted that the procedure in the APC Manual only specifies that routine, in-service inspections will be performed on a monthly basis in accordance with Section 6.3.2.1 of API Recommended Practice 510. Therefore, APC must amend their procedure to provide details on how to perform routine monthly, in-service inspections of their breakout tanks. In addition, the procedure must reference a correct API Standard for performing in-services inspections of their breakout tanks.

2. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (c) ***Maintenance and normal operations.*** The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:
 - (3) **Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.**

Anadarko Petroleum Corporation (APC) did not establish adequate written procedures for requiring adequate testing and inspection of overfill devices on aboveground breakout tanks at the required interval in accordance with §195.428(a). At the time of the inspection, it was noted that the procedure in the APC Manual does not address overfill protection procedures for aboveground breakout tanks. Records that were provided during the inspection for overfill protection reference §195.482(d), which does not exist, and illustrate a procedure that does not correlate to a procedure in the APC Manual. Therefore, APC must amend a procedure(s) to provide details on how to perform adequate testing and inspection of overfill protection on aboveground breakout tanks.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Anadarko Petroleum Corporation maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Dustin Hubbard, Acting Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2017-6024M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Dustin B. Hubbard", with a long, sweeping horizontal stroke extending to the right.

Dustin Hubbard
Acting Director, Western Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*

cc: PHP-60 Compliance Registry
PHP-500 D. Fehling (#153719)