

## WARNING LETTER

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 10, 2017

Mr. James Volker  
Chairman, President, and CEO  
Whiting Petroleum Corp.  
1700 Broadway, Suite 2300  
Denver, CO 80290

**CPF 5-2017-6029W**

Dear Mr. Volker:

On December 5 through 8, 2016, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your Redtail Crude Line in Weld County, Colorado.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

1. **§195.563 Which pipelines must have cathodic protection?**  
**(a) Each buried or submerged pipeline that is constructed, relocated, replaced, or otherwise changed after the applicable date in Sec. 195.401(c) must have cathodic protection. The cathodic protection must be in operation not later than 1 year after the pipeline is constructed, relocated, replaced, or otherwise changed, as applicable.**

During the inspection of your records, it was noted that Whiting Petroleum Corp (WPC) did not install Cathodic Protection (CP) on the Redtail Crude Line within one (1) year after the pipeline was constructed in accordance with §195.563(a). It is our understanding that the

Redtail Crude Line was built and then commissioned on April 15, 2015; however, the CP was not installed until April 27, 2016. Interviews with your PSM/DOT/One Call Supervisor revealed that WPC will be conducting a Close Interval Survey (CIS) of the line to ensure it was not affected by external corrosion.

As of April 27, 2017, under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists up to a maximum of \$2,090,022 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in Whiting Petroleum Corp being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2017-6029W**. 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).

Sincerely,

Kim West  
Acting Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry  
PHP-500 J. Coleman (#154305)