



March 13, 2020

Dustin Hubbard
Office of Pipeline Safety (OPS)
Pipeline & Hazardous Materials Safety Administration (PHMSA)
12300 W Dakota Ave., Suite 110
Lakewood, CO 80228

**RE: Corrective Actions for CPF 5-2020-7001M
Notice of Amendment for Platform A and Rincon Onshore Separation Facility (ROSF)**

Dear Mr. Hubbard:

DCOR, LLC (Company) submits the following corrective actions addressing the inadequacies found in the Company's plans or procedures during the 2019 DOT pipeline inspections of Platform A and Rincon Onshore Separation Facility (ROSF).

Our corrective action to each apparent inadequacy is as follow:

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

(a) ...

(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) ...

(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);...

DCOR Corrective Action

DCOR Procedure IMP-HL6, "Preventive & Mitigative Measures" was updated to reference the document (spreadsheet) titled "DCOR IM Program". A copy of the document was provided to the inspector at the time of the inspection. This document tracks the Company's risk analysis and continual mitigation efforts as required by 49 CFR Part 195.452.

A copy of Platform A's oil and gas pipeline risk analysis tracking titled "Risk Questionnaire & Determination" has been attached to this letter.

DCOR, LLC

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PHMSA – Western Region

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

(a) ...

(j) *What is a continual process of evaluation and assessment to maintain a pipeline's integrity?*

(1) ...

(2) **Evaluation.** An operator must conduct a periodic evaluation as frequently as needed to assure pipeline integrity. An operator must base the frequency of evaluation on risk factors specific to its pipeline, including the factors specified in paragraph (e) of this section. The evaluation must consider the results of the baseline and periodic integrity assessments, information analysis (paragraph (g) of this section), and decisions about remediation, and preventive and mitigative actions (paragraphs (h) and (i) of this section).

DCOR Corrective Action

DCOR Procedure IMP-HL6, "Preventive & Mitigative Measures" was updated to specify a frequency of evaluation of every 3 years as based on risk factors specific to the pipeline.

Additionally, the Company performs an in-line inspection of Platform A's oil and gas pipelines every two years as required by the Bureau of Safety and Environment Enforcement (BSEE) . Results are evaluated and submitted to BSEE for approval.

Should you have any questions or require additional information, please call Jerry Palo Jr. at (805) 535-2088.

Sincerely,



Robert L. Garcia

VP – Facilities & Process Engineering

Enclosure:

- (1) DCOR Integrity Management Program Procedure, IMP-HL6 " Preventive & Mitigative Measures
- (2) Integrity Management Program "Risk Questionnaire & Determination for Platform A"

cc: Office of Pipeline Safety (OPS)
Pipeline & Hazardous Materials Safety Administration (PHMSA)
Marion Garcia

cc: J. Penny
R. Bautista
J. Parcher
S. Knight
D. McDermott
J. Palo Jr.

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