



Hilcorp North Slope, LLC

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Anchorage, AK 99503
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November 4, 2022

Via E-mail to Dustin.Hubbard@dot.gov

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

**Re: Hilcorp North Slope, LLC
Response to Item 2, C.P.F. 5-2022-006-NOPV (Redacted Version)**

Dear Mr. Hubbard:

From August 2 through September 2, 2021, the Pipeline and Hazardous Materials Safety Administration (PHMSA) inspected the procedures and records of Hilcorp North Slope, LLC's (Hilcorp) Lisburne Pipeline, NGL Pipeline, and Oil Transit Pipelines. On September 7, 2022, PHMSA issued the above-referenced Notice of Probable Violation and Proposed Compliance Order (the NOPV) to Hilcorp. The NOPV includes four allegations and proposes a compliance order for Items 1 and 2 and classifies Items 3 and 4 as warning items.

Hilcorp North Slope, LLC offers the following response to Item 2 in the aforementioned NOPV.

Item 2 in the Notice of Probable Violation communicated that PQR number PQR-GT/SM-PL-013 did not support the welding that was completed on the subject non-pressure containing sleeves under the specified Weld Procedure, WPS-GT/SM-PL-013, because the speed of travel during welding was outside the range specified on the WPS. Separately, the Pipeline Safety Violation Report, referencing CPF# 5-2022-006-NOPV, Violation 2, Part E1, communicated that Hilcorp North Slope failed to follow weld procedure WPS-GT/SM-PL-013 during installation of the non-pressure sleeves because the GTAW process was not utilized for weld/pass layers 1 and 2 as specified in the WPS.

Hilcorp North Slope, LLC chose to complete option number 2 as specified in the Proposed Compliance Order section 'B' to satisfy the noted items. Hilcorp North Slope LLC submits PQR number HAK-SM-PL-S-001 (attached) which qualifies the welds completed on the non-pressure sleeves per CFR 195.214. Please note that the travel speed range documented on page 1 of the PQR covers the speed of travel at which the non-pressure sleeve welds were made. This is supported by the welding parameters documented on page 2 of the PQR. In addition, the SMAW process with an AWS Classification E8018-C3 filler was utilized for all passes of the weld. The mechanical testing reports for the weld sample are included as attachments to the PQR.

Hilcorp respectfully requests that PHMSA accepts this additional PQR and mechanical testing reports to satisfy and close the NOPV noted as Item 2. Hilcorp considers this document to contain confidential commercial information and therefore subject to FOIA Exemption 4, 5 USC 552(b)(4).

Please contact us if you have any questions related to the information provided in this response.

PHMSA CPF No. 5-2022-006-NOPV
November 4, 2022

Sincerely,
Hilcorp North Slope, LLC



Ben Wasson, PE
Pipeline Risk and Compliance Manager

Attachment: PQR number HAK-SM-PL-S-001 (Redacted)

Cc: Gabrielle St. Pierre, PE (PHMSA)
Michael Yaeger (PHMSA)
Cindy Monnin, PE (Hilcorp)