

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 09, 1998

Mr. Randy Hillman
Vice President of Pipeline Operations
Fina Pipeline Company
Box 1311
Big Spring, Texas 79721

Dear Mr. Hillman:

CPF No. 48506-C

Between December 16 and 18, 1997, a representative of the Southwest Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of the Fina Pipeline River system records and system in Texas and Oklahoma. During the inspection OPS found three items causing concern about the safe operation and maintenance of your pipeline facilities.

Record inspections indicated that Tank #14 at the Wichita Falls Terminal was internally inspected on 6-12-97. The inspection form noted that there were several areas of floor corrosion and leaking and it was recommended that repairs to the floor be made. There was no documentation to show if the floor was repaired or what type of follow up action was taken. It is recommended that follow up action be documented to show that recommended repairs were made after the inspection.

Inspection of the aerial patrol records indicates that the River Pipeline was adequately patrolled, but there was some difficulty on some of the reports determining which pipeline segment was being patrolled. This difficulty arose from the notation on the aerial patrol form that indicated which segments were actually flown that day. The notation 'Segments 1-32' may mean that segments 1 and 32 were flown, or that segments 1 through 32 were flown. It is recommended that when the form is filled out, each segment flown that day be individually noted, rather than noting, for example, that segments '1-32' were flown.

Site inspection of the Duncan terminal indicated that several items of general housekeeping needed attention. Several bolts were missing from the pump flange connections and there were open electrical conduits. It is recommended that the pump flanges be properly connected to the piping and the open electrical conduits be sealed.

You will not hear from us again with regard these concerns. Because of the good faith that you have exhibited up to this time, we expect that you will act to ensure that the problem discussed in this letter will be addressed. Please refer to CPF No. 48506-C in any correspondence/communication on this matter.

Sincerely,

R. M. Seeley
Regional Director, Southwest Region