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**ConocoPhillips  
Pipe Line Company**

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SENT TO COMPLIANCE REGISTRY  
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October 5, 2007

Chris Hoidal, Director Western Region  
Pipeline Hazardous Materials Safety Administration  
12300 West Dakota Avenue, Suite 110  
Lakewood, CO 80228

UPS Next Day Air

RE: CPF No. 5-2007-5005

Dear Mr. Hoidal,

Your office has recently requested a conversion of service plan for the lines in question. These lines are the Santa Maria Refinery feed line (Zenon Way), Santa Margarita gas line, and the Shandon gas line. ConocoPhillips Pipe Line Co (CPPL) is working on switching over to another pipeline for the Santa Maria Refinery (SMR) gas pipeline with in a year. The refinery will not be going down for any type of shutdown with in the next year. CPPL would like to propose some options that we believe would improve and continue the safe operation of the 3 lines in question until they can be taken out of service and tested or replaced, and with out shutting down production of the Santa Maria Refinery. As you can see below due to class locations on each line CPPL has chosen different options.

**Class Locations for the lines in question:**

Zenon Way gas line feed to Santa Maria Refinery. Class 2 - 3 ¼ mile, and Class 3 - ½ mile  
Santa Margarita gas line supplies pump feed to Santa Margarita Station. Class 1 – 2 ½ miles  
Shandon gas line supplies pump feed to Shandon Station. Class 1 – 1 ¾ miles

**Santa Maria Refinery feed line Class 2 & 3 location:**

As mentioned above CPPL is going to swap pipelines over next year. The line that is going to be used for SMR gas feed has all the necessary test records.

1. Performed a close interval survey on the feed line to the Santa Maria Refinery on 9/14/07. This close interval survey showed no deficiency.
2. Pipeline is being patrolled 2 times a week (weather permitting).
3. CPPL can take a 20% pressure reduction on the (SMR) feed line if we need to. The line is operating at 215 psig, CPPL would have to reduce the operating pressure to 172 psig. This may cause some impact on Refinery out put. CPPL would only take this step if the Western Region believes that the 2 steps that have already been taken are not enough.

**Santa Margarita gas line Class 1 location:**

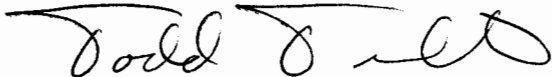
1. The Santa Margarita gas line will be tested per 192.507 to establish the MAOP; this should be done by June of 2008. If CPPL has the opportunity to complete this before June of 2008 CPPL will.
2. Pipeline is being patrolled 2 times a week (weather permitting).

**Shandon gas line Class 1 location:**

1. The 1 ¾ mile Shandon pipeline will be shortened to approximately ½ mile in length, once we have received the proper permits from the State of California for the road bore. This ½ mile section will be replaced with tested poly pipe by December of 2007.
2. Pipeline is being patrolled 2 times a week (weather permitting).

Once again these pipelines are being maintained per 49 CFR 192 regulations. All maintenance and inspections will continue on these 3 lines. Should you or your staff have any questions please feel free to call me at (405) 879-4871.

Sincerely,



Todd Tullio  
ConocoPhillips Pipe Line Co.  
Acting Director, Pipeline Regulatory Compliance