U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

901 Locust Street, Suite 462
Kansas City, Missouri 64106-2641

NOTICE OF PROBABLE VIOLATION
PROPOSED CIVIL PENALTY
and
PROPOSED COMPLIANCE ORDER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 25, 2016

Mr. Robert Haugen
Executive Vice President of Refining Operations
Coffeyville Resources Crude Transportation, LLC
2277 Plaza Drive
Suite 500; Building B
Sugarland, TX 77479

CPF 3-2016-5006

Dear Mr. Haugen:

On September 14-18 and 21-25, 2015, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code inspected your records in Bartlesville, Oklahoma and your facilities in Kansas and Oklahoma.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation(s) are:

1. **§194.7 Operating restrictions and interim operating authorization**

   (b) An operator must operate its onshore pipeline facilities in accordance with the applicable response plan.

Coffeyville Resources Crude Transportation, LLC personnel (CVR) did not conduct the quarterly notification drills as specified by their OPA 90/Emergency Response Plan.

CVR personnel indicated that they did not conduct the quarterly notifications drills because they relied on their SCADA alarm callouts to meet that requirement. However, the use of the alarm logs does not meet the exercise documentation requirements. Furthermore, the National Preparedness for Response Exercise Program guidelines (PREP) does not recognize that actual alarm events can be used in lieu of the drills.

2. **§195.404 Maps and Records.**

   (b) Each operator shall maintain for at least 3 years daily operating records that indicate-

   (1) The discharge pressure at each pump station;

   CVR was not maintaining the discharge records for their pump stations for three years.

   While reviewing the pressure discharge records, CVR personnel indicated that they were only keeping two years of discharge records for each of their pump stations.

3. **§195.404 Maps and Records.**

   (c) Each operator shall maintain the following records for the periods specified;

   (3) A record of each inspection and test required by this subpart shall be maintained for at least 2 years or until the next inspection or test is performed, whichever is longer

   CVR did not maintain records for the inspection of their mainline valves for at least two years on three lines. The missing inspections were for the second half of 2013.

   PHMSA conducted the inspection in September 2015. CVR should have kept all records for mainline valves from at least September 2013. However, CVR personnel could not provide any records to show that they had inspected the mainline valves for the second half of 2013 for the following lines:

Segment	Number of Valves	2nd inspection cycle
Broome to Coffeyville 12"	7	Missing
Broome to Coffeyville 16"	2	Missing
Coffeyville to Coffeyville Refinery	3	Missing

CVR did indicate through records for valve inspection of other line segments that the inspections could have occurred in July of 2013. But there were no other records to substantiate this assertion.

4. **§195.404 Maps and Records.**

   (c) Each operator shall maintain the following records for the periods specified;

   (3) A record of each inspection and test required by this subpart shall be maintained for at least 2 years or until the next inspection or test is performed, whichever is longer

   CVR did not maintain the records demonstrating that the over-pressure protection devices were checked annually. Additionally, CVR did not document the inspection of the flow controllers at the pump stations. The PHMSA inspection was conducted in September of 2015, which would require CVR to maintain the records for the inspection of these devices from at least September of 2013.

   CVR was unable to show that the over-pressure protection and flow control devices at Hooser station, Coffeyville station, Valley Station, and Valley Booster were inspected annually for the periods shown below. While reviewing the records for over-pressure protection, the following stations' records were noted as missing:

Station	Missing Record of Inspection Year
Hooser	2014
Coffeyville	2014, 2015
Valley	2015
Valley Booster	2014

5. **§195.404 Maps and Records.**

   (c) Each operator shall maintain the following records for the periods specified;

   (3) A record of each inspection and test required by this subpart shall be maintained for at least 2 years or until the next inspection or test is performed, whichever is longer

   CVR personnel did not document their monthly above-ground breakout tank inspections in accordance with API 653.

   Review of the required tank inspection records found that CVR did not have all the monthly inspection documents for 2013 through 2015. The missing monthly tank inspection records are as follows:

Tank Number	Year and Month missed.
Tank 1105	**2014**: 1, 2, 3, 4, 5, 6, 11, 12
Tank 1106	**2014**: 1, 2, 3, 4, 5, 6, 11, 12
Tank 22A1	**2014**: 1, 2, 3, 4, 5, 6, 12
Tank 22A2	**2014**: 1, 2, 3, 4, 5, 6, 11, 12
Tank 22A3	**2014**: 1, 2, 3, 4, 5, 6, 9, 12
Tank 200	**2013**: 10, 11, 12 **2014**: 5, 6, 7, 8, 9, 10, 11, 12 **2015**: 2, 3
Tank 225	**2013**: 10, 12 **2014**: 5, 6, 7, 8, 9, 10, 11, 12 **2015**: 2, 3
Tank 230	**2013**: 10, 12 **2014**: 5, 6, 7, 8, 9, 10, 11, 12 **2015**: 2, 3
Tank 270	**2013**: 10, 12 **2014**: 5, 6, 7, 8, 9, 10, 11, 12 **2015**: 2, 3, 4, 5, 6, 7
Tank 285	**2013**: 10, 11, 12 **2014**: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 **2015**: 1, 2, 3, 6
Tank 290	**2013:** 10, 11, 12 **2014:** 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 **2015:** 1, 2, 3, 6

6. §195.410 Line markers.

(a) Except as provided in paragraph (b) of this section, each operator shall place and maintain line markers over each buried pipeline in accordance with the following:

(2) The marker must state at least the following on a background of sharply contrasting color:

(ii) The name of the operator and a telephone number (including area code) where the operator can be reached at all times.

CVR's line markers did not contain a telephone number where the operator could be reached at all times. Additionally, there were some exposures that had the line markers with only the previous pipeline operator's information.

While driving the 12" Broome to Coffeyville line through Coffeyville, it was noted that the mainline and the mainline valves were marked with old line markers that contained an incorrect telephone number. The line markers contained a 316-251-4000 number for night

time calls that was inactive. The other number, 1-800-982-4112, takes the caller to a recording that directed callers of any pipeline emergencies to call 1-800-696-2614 – a number which is not stated on the line markers.

It was also noticed that on the #1-8" and #3-8" lines, the exposures observed during the field evaluation still contained the line markers from the previous operator. Line markers are required to state the current operator.

7. **§195.426 Scraper and sphere facilities.**

No operator may use a launcher or receiver that is not equipped with a relief device capable of safely relieving pressure in the barrel before insertion or removal of scrapers or spheres. The operator must use a suitable device to indicate that pressure has been relieved in the barrel or must provide a means to prevent insertion or removal of scrapers or spheres if pressure has not been relieved in the barrel.

CVR did not use a suitable device to ensure that the pressure in the barrel was relieved prior to insertion or removal of scrapers or spheres.

During the field evaluation of the CVR system, it was noted that at many of the launchers/receivers at the pump stations, the chain to prevent opening the trap door was disconnected from the warning device on the barrel. In order for this warning device to work properly, the chain must be connected.

8. **§195.428 Overpressure safety devices and overfill protection systems**

(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

CVR did not inspect and test the thermal relief valves at Broome station at intervals not to exceed 15 months, but at least once each calendar year in 2015.

During the field inspection, it was found that Broome station had installed five new thermal relief valves on the newly built section of the station. As of the PHMSA inspection in September 2015, these relief valves had not been inspected. CVR personnel indicated that the new section was built in February of 2014 and that the relief valves were scheduled for inspection in December of 2015. The inspections should have been completed by May 31, 2015.

9. **§195.432 Inspection of in-service breakout tanks.**

(b) Each operator must inspect the physical integrity of in-service atmospheric and low-pressure steel above-ground breakout tanks according to API Std 653 (except section 6.4.3, Alternative Internal Inspection Interval) (incorporated by reference, see §195.3). However, if structural conditions prevent access to the tank bottom, its integrity may be assessed according to a plan included in the operations and maintenance manual under §195.402(c)(3). The risk- based internal inspection procedures in API Std 653, section 6.4.3 cannot be used to determine the internal inspection interval.

CVR personnel did not inspect their above-ground breakout tanks according to API 653 in that they did not conduct the five year in-service external tank inspections.

Section 6.3.2 of API 653 requires external inspections by an authorized inspector. Subsection 6.3.2.1 requires the inspection to occur every five years or RCA/4N years (where RCA is the difference between the measured shell thickness and the minimum required thickness in mils, and N is the shell corrosion rate in mils per year) whichever is less. Since CVR had no information on shell corrosion rates to apply the RCA/4N equation, they should have had an external inspection of the tanks by an authorized inspector five years from the time they acquired the tanks.

The tanks were acquired in 2004. Review of the required tank inspection records found that CVR did not conduct the required five year external inspection for nine of their breakout tanks by 2009. The tanks that were not inspected every five years in accordance with API 653 are as follows:

Valley Center Tank 290
Hooser Tank 270
Hooser Tank 230
Hooser Tank 225
Hooser Tank 200
Valley Center Tank 285
Broome Tank 1106
Coffeyville Tank 22A2
Plainville Tank 20

10. **§195.432 Inspection of in-service breakout tanks.**

(b) Each operator must inspect the physical integrity of in-service atmospheric and low-pressure steel above-ground breakout tanks according to API Std 653 (except section 6.4.3, Alternative Internal Inspection Interval) (incorporated by reference, see

§195.3). However, if structural conditions prevent access to the tank bottom, its integrity may be assessed according to a plan included in the operations and maintenance manual under §195.402(c)(3). The risk- based internal inspection procedures in API Std 653, section 6.4.3 cannot be used to determine the internal inspection interval.

CVR did not complete the recommended repairs as indicated in the API 653 inspection, nor was there any summary of why those repairs were not implemented.

During the field review of the breakout tanks, it was noted that some of the recommended repairs to the tanks had not been completed. For example:

a) There were no tell-tale holes in the re-enforcement pads on the tanks at Broome and Hooser. Additionally, tell-tale holes were found plugged at Coffeyville Station. These must be open to the atmosphere per API 650.
b) Soil was up against the tank shell at Broome station. It was also noticed that the mounds of soil at Coffeyville were washing away and building up against the tanks.
c) In Coffeyville, there was no electrical ground cable between the stairs and the floating roof. The wheels that roll on the roof are not sufficient for the ground.
d) No sealant was found around the rivets at Broome station.

API 653 Section 6.9.3 states that "*The owner/operator shall ensure that the disposition of all recommended repairs and monitoring is documented in writing and that reasons are given if recommended actions are delayed or deemed unnecessary.*" At the time of the PHMSA inspection, there was no summary of why the repairs were delayed or deemed unnecessary.

11. §195.432 Inspection of in-service breakout tanks.

(d) The intervals of inspection specified by documents referenced in paragraphs (b) and (c) of this section begin on May 3, 1999, or on the operator's last recorded date of the inspection, whichever is earlier.

Where paragraph (b) states:

Each operator must inspect the physical integrity of in-service atmospheric and low-pressure steel above-ground breakout tanks according to API Std 653 (except section 6.4.3, Alternative Internal Inspection Interval) (incorporated by reference, see §195.3). However, if structural conditions prevent access to the tank bottom, its integrity may be assessed according to a plan included in the operations and maintenance manual under §195.402(c)(3). The risk- based internal inspection procedures in API Std 653, section 6.4.3 cannot be used to determine the internal inspection interval.

CVR personnel did not inspect their above-ground breakout tanks according to API 653, in

that they did not conduct the initial 10 year out-of-service tank inspections by 2009.

CVR acquired the breakout tanks in 2004. CVR did not have any records of previous inspections so the inspection intervals began on May 3, 1999. API 653 states that the initial inspection interval must not exceed 10 years. Because CVR did not have any data from the previous operator, the interval for inspection must start at 10 years. This required all the tanks to be inspected by May 3, 2009. The following are the tanks PHMSA identified that missed the 2009 out-of-service inspection date:

Tanks	Last API 653 Out of Service Inspection
Valley Center Tank 290	July 21, 2014
Hooser Tank 270	July 14, 2014
Hooser Tank 230	September 2015
Hooser Tank 225	Unknown
Hooser Tank 200	Unknown
Valley Center Tank 285	January 26, 2015
Broome Tank 1106	February 8, 2013
Coffeyville Tank 22A2	June 11, 2012
Plainville Tank 20	May 8, 2014

12. §195.452 Pipeline integrity management in high consequence areas.

(h) ***What actions must an operator take to address integrity issues?***

(1) ***General requirements.*** **An operator must take prompt action to address all anomalous conditions the operator discovers through the integrity assessment or information analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity. An operator must be able to demonstrate that the remediation of the condition will ensure the condition is unlikely to pose a threat to the long-term integrity of the pipeline. An operator must comply with § 195.422 when making a repair.**

(i) ***Temporary pressure reduction.*** **An operator must notify PHMSA, in accordance with paragraph (m) of this section, if the operator cannot meet the schedule for evaluation and remediation required under paragraph (h)(3) of this section and cannot provide safety through a temporary reduction in operating pressure.**

CVR personnel did not notify PHMSA that CVR could not meet the schedule for evaluation and remediation required under 195.452(h)(3). Review of the ILI repair records and final reports found that CVR took anywhere from one to five days to repair an immediate repair condition with no pressure reduction. The #1-8 line was operating at 272 psig and the #3-8 Line was operating at 98 psig.

The repairs that did not get reported to PHMSA are as follows:

#1-8" Line:

Dig #	Final Report Date	Repair Date
137971.28	October 18, 2014	November 19, 2014
137975.02	October 18, 2014	November 19, 2014
137976.57	October 18, 2014	November 19, 2014

#3-8" Line

Dig#	Final Report Date	Repair Date
95573	October 18, 2014	October 23, 2014

13. §195.452 Pipeline integrity management in high consequence areas.

(h) ***What actions must an operator take to address integrity issues?***

(4) ***Special requirements for scheduling remediation***

(i) Immediate repair conditions. An operator's evaluation and remediation schedule must provide for immediate repair conditions. To maintain safety, an operator must temporarily reduce operating pressure or shut down the pipeline until the operator completes the repair of these conditions. An operator must calculate the temporary reduction in operating pressure using the formula in Section 451.6.2.2 (b) of ANSI/ ASME B31.4 (incorporated by reference, see § 195.3). An operator must treat the following conditions as immediate repair conditions:

(C) A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) that has any indication of metal loss, cracking or a stress riser.

CVR did not take any pressure reduction from the operating pressure on the Valley 6" #2 and #3 line segments once they were notified of top side dents with metal loss (immediate repair conditions). Records provided to PHMSA indicated that the lines were operating at approximately 500 psig in 2014. CVR's supervisors on the job indicated to PHMSA at the time of the inspection that no pressure reduction was taken.

The following immediate repairs should have had a pressure reduction done once CVR was notified of the immediate conditions:

Valley 6" #2

Dig #	Final Report Date	Repair Date
10769.67	June 23, 2014	July 16, 2014
9513.54	June 23, 2014	August 6, 2014
24364.91	June 23, 2014	August 27, 2014
37672.2	June 23, 2014	July 15, 2014

Valley 6" #3

Dig#	Final Report Date	Repair Date
46468.67	June 30, 2014	July 16, 2014

This probable violation is a repeat violation as identified in CPF 3-2012-5010, Item 3.

14. §195.452 Pipeline integrity management in high consequence areas.

(i) What preventive and mitigative measures must an operator take to protect the high consequence area?

(1) General requirements. An operator must take measures to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area. These measures include conducting a risk analysis of the pipeline segment to identify additional actions to enhance public safety or environmental protection. Such actions may include, but are not limited to, implementing damage prevention best practices, better monitoring of cathodic protection where corrosion is a concern, establishing shorter inspection intervals, installing EFRDs on the pipeline segment, modifying the systems that monitor pressure and detect leaks, providing additional training to personnel on response procedures, conducting drills with local emergency responders and adopting other management controls.

CVR did not take measures to prevent and mitigate consequences of a pipeline failure that could affect a high consequence area per their Integrity Management Plan (IMP).

CVR could not provide any documentation showing that CVR had taken preventive and mitigative (P&M) actions per their IMP. The IMP plan, implemented on February 21, 2013, references appendices for P&M measures and P&M evaluation forms. However, the P&M measures did not appear to be documented in that the appendices were never developed and, the evaluation forms were not filled out.

15. §195.505 Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(b) Ensure through evaluation that individuals performing covered tasks are qualified;

CVR did not follow its written qualification program to ensure through evaluation that individuals performing covered tasks are qualified.

While reviewing the mainline valve inspection records, PHMSA asked for the Operator Qualification records of the three employees conducting the valve inspection. CVR was unable to provide any records that showed that the employees were qualified to inspect and operate mainline valves for the years 2013-2015.

16. §195.571 What criteria must I use to determine the adequacy of cathodic protection?

Cathodic protection required by this Subpart must comply with one or more of the applicable criteria and other considerations for cathodic protection contained in paragraphs 6.2 and 6.3 of NACE SP 0169 (incorporated by reference, see § 195.3).

CVR did not properly apply the consideration of voltage (IR) drop to a test point located on the Hooser 8" line as required by paragraph 6.3 of NACE SP0169.

Review of the cathodic protection records found what initially appeared to be consecutive low readings at the test station located at West Fuller property line on the Hooser 8".

The readings found for that location were as follows:

Year	Reading
2010	-0.600v
2011	-0.690v
2012	-0.640v
2013	-0.800v
2014	-0.650v
2015	-0.570v

The records also identified a "native" potential of the pipe to be -0.200v. There was no documentation within the records that showed that CVR did an instant-off potential to verify that the low readings would meet the 100mv drop criterion. If CVR is going to utilize the 100 mv criterion to verify adequate cathodic protection, the instant-off reading or some other form of IR drop consideration must be performed and documented.

17. §195.573 What must I do to monitor external corrosion control?

(a) Protected pipelines. You must do the following to determine whether cathodic protection required by this subpart complies with §195.571:

(1) Conduct tests on the protected pipeline at least once each calendar year, but with intervals not exceeding 15 months. However, if tests at those intervals are

impractical for separately protected short sections of bare or ineffectively coated pipelines, testing may be done at least once every 3 calendar years, but with intervals not exceeding 39 months.

CVR did not conduct annual testing of its cathodic protection on multiple facilities in the CVR system between and 2013 and 2015.

Review of CVR's annual cathodic protection readings identified the following facilities that missed the annual cathodic protection monitoring:

Facility	Years Missed
Broome Station and Tank readings	2013, 2014
Coffeyville Station and Tank readings	2013, 2014
Valley Station tank readings	2013
Hooser Station	2013
Broome to Coffeyville 16"	2013, 2015
Broome to Coffeyville 12"	2013, 2014, 2015
Coffeyville Station to Refinery – 12" & 16"	2013, 2014
Shidler 4" Discharge Line	2013
Humboldt Line	2013, 2014
Hooser Station to Highway 99	2013

18. §195.583 What must I do to monitor atmospheric corrosion control?

(a) You must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

If the pipeline is located:	Then the frequency of inspection is:
Onshore	**At least once every 3 calendar years, but with intervals not exceeding 39 months**
Offshore	**At least once each calendar year, but with intervals not exceeding 15 months**

CVR did not conduct atmospheric corrosion inspections of its onshore pump stations at least once every three years.

In response to a request for atmospheric inspection records from 2009-2015, CVR submitted records showing ultrasonic (UT) inspections of the wall thickness of the above-ground facilities in Coffeyville station for 2012 and 2013 as well as Hooser Station in 2013. However, there were no records indicating that atmospheric inspections were being done at the time of this UT evaluation. Additionally, no other records were submitted for Broome, Shidler, Coffeyville, Valley, Valley Booster #1 and #2, and Hooser stations.

Proposed Civil Penalty

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed $200,000 per violation per day the violation persists up to a maximum of $2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed $100,000 per violation per day, with a maximum penalty not to exceed $1,000,000 for a related series of violations. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation(s) and has recommended that you be preliminarily assessed a civil penalty of $497,600 as follows:

Item number	PENALTY
4	$23,300
5	$25,900
8	$33,100
9	$54,700
11	$54,700
13	$79,200
15	$79,200
17	$95,000
18	$52,500

Warning Items

With respect to item(s) 1, 2, 3, 7, 10, 12, and 16, 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 promptly correct these item(s). Failure to do so may result in additional enforcement action.

Proposed Compliance Order

With respect to item(s) 6, 14, 18, and pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to Coffeyville Resources Crude Transportation, LLC. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. All material you submit in response to this enforcement action may be 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). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and

authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

In your correspondence on this matter, please refer to **CPF 3-2016-5006** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Allan C. Beshore
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Compliance Proceedings

PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Coffeyville Resources Crude Transportation, LLC a Compliance Order incorporating the following remedial requirements to ensure the compliance of Coffeyville Resources Crude Transportation, LLC (CVR) with the pipeline safety regulations:

1. In regard to Item Number six of the Notice pertaining to line markers on the Coffeyville 16" and 12" and the exposures on the #1-8" and #3-8", CVR must survey the 16" and 12" from Broome Station to Coffeyville Station and the line(s) to the Refinery and replace and/or update the line markers with the correct phone 24 hour number. In regards to the #1-8" and #3-8", CVR must identify all exposures on those lines and replace any line markers from the previous operator with their own line markers.

2. In regard to Item Number 14 of the Notice pertaining to failing to implement the Preventive and Mitigative (P&M) measures as defined in the Integrity Management Plan (IMP) and developing the appendices for the P&M Measures, CVR must develop the appendices for Section five of the IMP and begin following the procedures for P&M measures as defined by the IMP plan.

3. In regard to Item Number 18 of the Notice pertaining to atmospheric corrosion inspections, CVR must develop and implement a schedule and to atmospherically inspect the stations and all other above-ground piping.

4. In regard to item number one above, CVR must complete the survey and replacement of the line markers within 30 days of the date of receipt of the Final Order. In regards to Item number two above, CVR must complete the development of the appendices for the P&M measures within 45 days of the date of the Final Order. CVR must also implement the P&M measures procedures upon completion of the development of the measures. Additionally, for a period of one year from the date of the Final Order, CVR will submit quarterly status reports outlining the P&M measures taken to the Director, PHMSA Central Region. In regards to item number three above, CVR will submit a schedule to atmospherically inspect the stations and any other above-ground piping within 30 days of the receipt of the Final Order. The atmospheric inspections of all above ground piping must be completed within one year of the date of the Final Order.

5. It is requested (not mandated) that Coffeyville Resources Crude Transportation, LLC maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Allan C. Beshore, Director, Central Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.