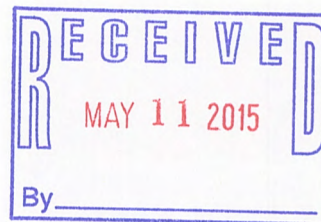


Todd Tullio
Manager
Regulatory Compliance

PHILLIPS 66 PIPELINE LLC
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PHILLIPS 66
PIPELINE LLC



April 24, 2015

Rod Seeley Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner
Suite 1110
Houston, Texas 77074

RE: CPF No. 4-2015-5008M

Dear Mr. Seeley:

This letter is in response to your letter dated March 31, 2015 regarding the Notice of Amendment (NOA) received by Phillips 66 Pipeline LLC (Phillips 66) on April 6, 2015.

By submitting this response, Phillips 66 does not waive any right, privilege or objection that it may have in any separate or subsequent proceeding related in any way to the information provided in this response.

On the basis of your inspection, PHMSA identified some inadequacies within Phillips 66 plans and procedures, as described below. Phillips 66 responses to the noted inadequacies are below. We have attached procedure updates for your review as well.

- Item 1. §195.202 Compliance with specifications or standards.**
Each pipeline system must be constructed in accordance with comprehensive written specifications or standards that are consistent with the requirements of this part.

PHMSA Concern:

The Phillips 66 procedure, P66PL-MPR-4401, Procedures and Welder Qualification, does not specifically require that all welding on PHMSA-regulated pipelines must be performed using procedures qualified according to the requirements of §195.214(a). In addition, the Phillips 66 procedure does not state that the operator will retain and follow the recorded qualified welding procedure whenever it is used as

required by §195.214(b). During the PHMSA inspection, personnel involved in welding or inspecting welds on the Triple C project were unable to produce a record of the qualified welding procedure or any documentation that the procedure was being followed. Operator personnel argued that the Phillips 66 procedure did not require documentation of the welding inspections. However, without this documentation, PHMSA cannot verify that the operator was ensuring that the qualified welding procedures were being followed.

Phillips 66 must modify their welding procedure to require that all welding performed on PHMSA-regulated pipelines must be done according to welding procedures qualified to the requirements of §195.214(a). The Operator must also modify their procedures include a process for documenting welding inspections to ensure the welding is being done according to the qualified procedure.

Phillips 66 Response:

Phillips 66 modified its procedure, MPR-4401 – Welding Procedures and Welder Qualifications as requested by PHMSA. Phillips 66 has added an additional section 11.5 to include a weld visual inspection report and the frequency the report needs to be completed. Attached are MPR-4401 and form 4401B visual inspection report.

Item 2. §195.202 Compliance with specifications or standards.
Each pipeline system must be constructed in accordance with comprehensive written specifications or standards that are consistent with the requirements of this part.

PHMSA Concern:

The Phillips 66 Welding Procedure, Section 8.1 Production Weld Visual Inspection, does not include the requirement and method of documenting or recording the data needed to assure the procedure is being followed. Phillips 66 personnel argued that their procedures didn't require the inspections to be documented and consequently were unable to produce any records that the visual inspection of welds was being done according to their procedures and the requirements of API 1104, Section 9.

However, the Phillips 66 Welding Procedure require that all production welds be thoroughly inspected to identify any defects, that the root pass and each interpass should be inspected for any defects before the next weld pass is made, and nineteen other visual inspection items needed to ensure the quality of the welds. Without inspection records, the Operator doesn't have any means to show that their visual inspection procedures were followed.

Phillips 66 must to amend their Welding Procedures to include a method of documenting and recording data needed to verify that the procedures for visual inspection of every weld are being performed.

Phillips 66 Response:

Phillips 66 modified its procedure, MPR-4401 – Welding Procedures and Welder Qualifications as requested by the PHMSA. Phillips 66 has added an additional section 11.4 to include a weld compliance report and the frequency the report

needs to be completed. Attached are MPR-4401 and form 4401A compliance inspection report.

Please let me know if you have any questions or comments regarding this matter.

Sincerely,



Todd Tullio
Manager, Regulatory Compliance

CC. Dave Barney/Phillips 66
Van Williams/Phillips 66
Todd Denton/Phillips 66
Manny Cortez/Phillips 66