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July 7, 2015

Byron Coy, Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF No. 1-2015-5007W

Dear Mr. Coy:

This letter is in response to your letter dated June 8, 2015 regarding the Warning Letter received by Phillips 66 Pipeline LLC (Phillips 66) on June 15, 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 items within Phillips 66 plans and procedures, as described below. Phillips 66 responses to the noted warning items are below.

Item 1. §195.452 Pipeline integrity management in high consequence areas.

(a)...

(i) what records must be kept? (1) An operator must maintain for review during an inspection:

(ii) Documents to support the decisions and analyses, including any modifications, justifications, variances, deviations and determinations made, and actions taken, to implement and evaluate each element of the integrity management program listed in paragraph (f) of this section....1

PHMSA Concern:

Phillips integrity management records failed to demonstrate compliance per §195.452(1)(1)(iif) Phillips Field Anomaly Evaluation Report Doc. No. e-Form 3933B, evaluation repair date 11/15/2013, contained inaccurate information.

During the inspection, the PHMSA inspector reviewed Phillips in-line inspection remediation projects and anomaly reports. The Field Anomaly Evaluation Report e-Form 3933B dated 11/15/2013, indicated that the "[maximum operating pressure (MOP)] at Feature" was 678 pounds per square inch gauge (psig). Phillips stated that the MOP of the pipeline is 275 psig. Phillips could not produce any documentation or analysis which supported the "MOP at feature" indicated on the report. Phillips stated this "MOP at Feature" was incorrectly input or calculated by Phillips personnel.

Phillips 66 Response:

Phillips 66 makes all repairs at or above the MOP of the pipeline. The form 3933B dated 11/15/2013 included information which was labeled MOP at Feature when in fact the information accurately reflected the Repair Pressure. In this case, the repair provides protection in excess of the MOP of the pipeline (275 psig) up to a maximum of 678 psig. Phillips 66 has corrected form 3933B to read "Repair Pressure" instead of "MOP at Feature".

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