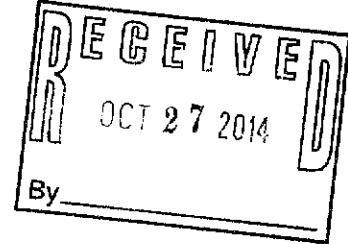


Todd Tullio
Manager
Regulatory Compliance

PHILLIPS 66 PIPELINE LLC
3010 Briarpark Drive
P.O. Box 4428
Houston, TX 77042
Phone 832-765-1636



October 21, 2014

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

RE: CPF No. 4-2014-5024M

Dear Mr. Seeley:

This letter is in response to your letter dated September 22, 2014 regarding the Notice of Amendment (NOA) received by Phillips 66 Pipeline LLC (Phillips 66) on September 25, 2014.

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. §195.208 Welding of supports and braces.**
Supports or braces may not be welded directly to pipe that will be operated at a pressure of more than 100 p.s.i. (689 kPa) gage.

PHMSA Concern:

Phillips' welding procedures do not prohibit welding of supports or braces directly to pipe that will be operated at a pressure of more than 100 p.s.i. (689 kPa) gage. On July 16, 2012, PHMSA issued a Final Order with a Compliance Order (CPF 4-2012-5005) to Phillips for welding braces directly to the suction and discharge piping at the Clifton Ridge Marine Terminal main pumps. As a result of this Compliance Order, Phillips surveyed their operating facilities for similar equipment and brought

their facilities into compliance with 49 CFR 195. By doing so, Phillips had completed the actions in Compliance Order. However, Phillips did not revise the procedure.

To avoid similar occurrence in the future, Phillips must amend their procedures to include prohibition of supports or braces to be welded directly to pipe that will be operated at a pressure of more than 100 p.s.i.

Phillips 66 Response:

Phillips 66 modified its procedure, MPR-4401 – Welding Procedures and Welder Qualifications in May of 2014 during the inspection, as requested by the inspector. Phillips 66 added a caution statement to section 7.1.1.10 based on requirements in 49 CFR 195.208. Phillips 66 has provided the updated procedure including the revision history.

Item 2. §195.216 Welding: Miter joints.
A miter joint is not permitted (not including deflections up to 3° that are caused by misalignment).

PHMSA Concern:

Phillips' welding procedures does not prohibit miter joints (not including deflections up to 3° that are caused by misalignment) in their welding procedure MPR 4401 - Welding Procedures and Welder Qualification.

Phillips must amend the welding procedures to include prohibition of a miter joint.

Phillips 66 Response:

Phillips 66 modified its procedure, MPR-4401 – Welding Procedures and Welder Qualifications in May of 2014 during the inspection, as requested by the inspector. Phillips 66 added an additional bullet point to section 8.1.2.12 so the statement would be easily identified when reviewing this procedure. Phillips 66 has provided the updated procedure including the revision history.

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