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March 11, 2010

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

RE: CPF 5-2010-5002

Dear Mr. Hoidal:

This letter is in response to your letter dated February 12, 2010 regarding the Notice of Probable Violation (NOPV), received by ConocoPhillips Pipe Line Company (CPPL) on February 17, 2010 issued as a result of an audit that was performed on June 15-19, 2009 on CPPL's Pioneer Pipeline System in Utah and Wyoming. CPPL's response to this NOPV is set forth below.

The purpose of this letter is to contest the findings of the NOPV and the proposed compliance order. CPPL does not request an oral hearing but submits this letter and the attached materials in response to the allegations in the NOPV and stating CPPL's objections to the NOPV and proposed compliance order.

By submitting this response, CPPL 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.

PHMSA Concerns:

1. §195.567 Which pipelines must have test leads and what must I do to install and maintain the leads

(b) Installation. You must install test leads as follows:

(1) Locate the leads at intervals frequent enough to obtain electrical measurements indicating the adequacy of cathodic protection.

At the time of the inspection, the casing test lead at MP 272 had no near by test lead that could be used to verify adequate cathodic protection level on the carrier pipe (pipeline) within the casing. The lead on the pipeline was missing at the time of the annual CP surveys in 2007 and 2008. The adjacent pipeline test leads are at MP 271.504 and 273.200. After the inspection, PHMSA was informed by ConocoPhillips that a pipe test lead was installed at MP 272 in the fall of 2009. Nevertheless, for three years the spacing between test leads at MP 271.504 and 273.200 was not adequate to determine that adequacies of cathodic protection for the pipeline in the vicinity of the casing.

CPPL's Response:

The item above has been addressed and will be explained in more detail in our response to your Request For Specific Information.

PHMSA Concerns:

2. §195.577 *What must I do to alleviate interference currents*

(a) *For pipelines exposed to stray currents, you must have a program to identify, test for, and minimize the detrimental effects of such currents.*

The cathodic protection survey records for 2008 indicate locally elevated pipe-to-soil potential (P/S) readings at MP 135.7 (2.884V), MP 136 (3.556V), and MP 137 (2.271V). The P/S readings were also locally elevated in 2007. This is evidence of possible detrimental electrical interference from other underground structures has been accruing for at least two years near areas of milepost 136.00. CPPL did not provide interference testing records or polarized potential, close interval survey readings to the inspector.

CPPL's Response:

Attached to this email are records to show that CPPL has been managing the elevated readings based on the installation of a critical bond that was installed in 2002. The area of concern is located between two of Plains Pipeline rectifiers from MP 136 to MP 140. CPPL is picking up interference current from the Plains Pipeline rectifiers, but returning it through a critical bond that has been in place since the 2002 close interval inspection which identified elevated readings. Due to personnel changes immediately prior to the audit, the location of the critical bond was unclear to the CPPL employee.

Attachments:

1. Annual survey records for the last 3 years.
2. Bond current showing return current to Plains
3. 2002 Close Interval Survey (each page = 1000')

CPPL requests a finding on each of the items of the NOPV that CPPL is in compliance and that no compliance order is necessary. Should you or your staff have any questions please feel free to call me at (832)379-6255.

Sincerely,

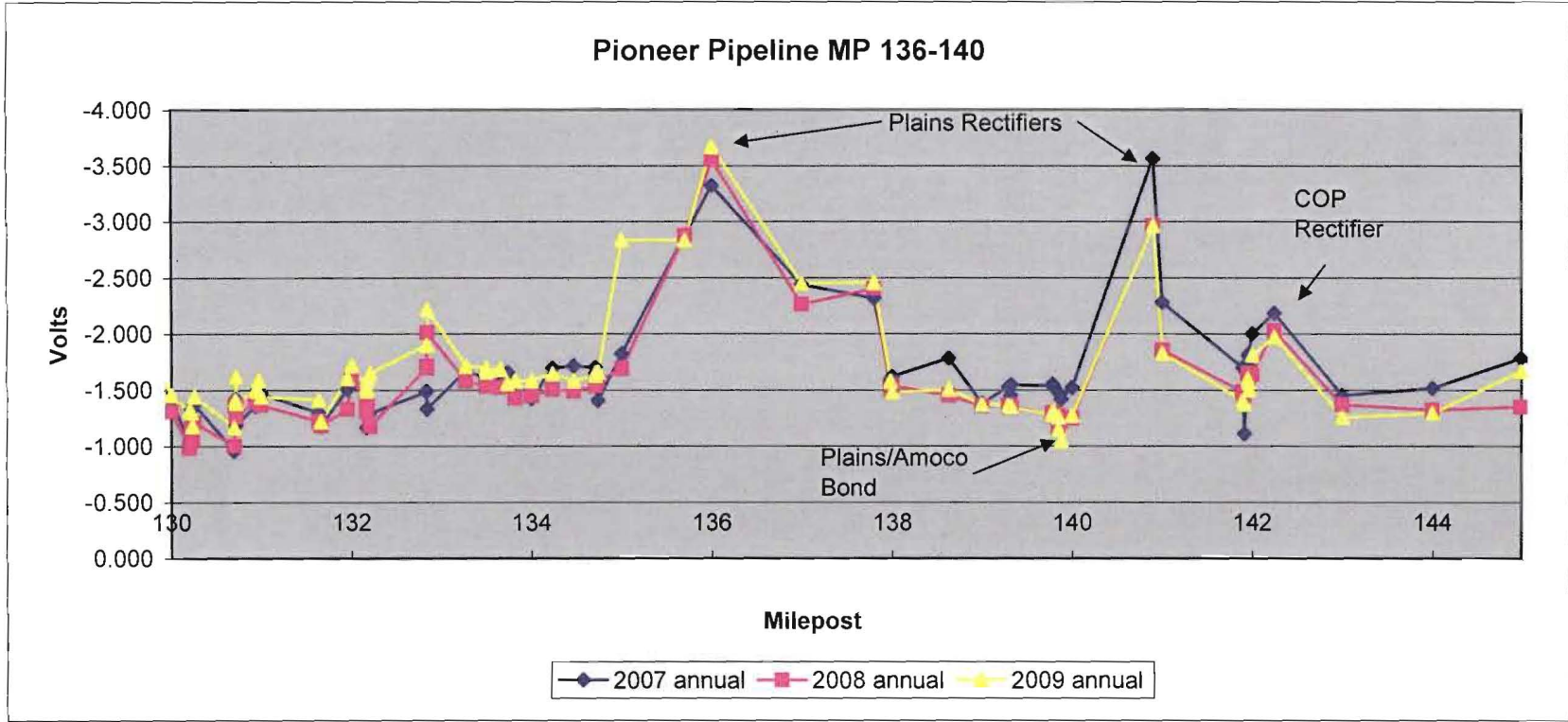
A handwritten signature in black ink, appearing to read "Todd Tullio". The signature is fluid and cursive, with a large loop at the end.

Todd Tullio

Manager, Regulatory Compliance

CC: C. Allen
M. Drumm
V. Williams

03-15-10P12:13 RCVD



ATTACHMENT 1
 Annual Survey records for the last 3 years

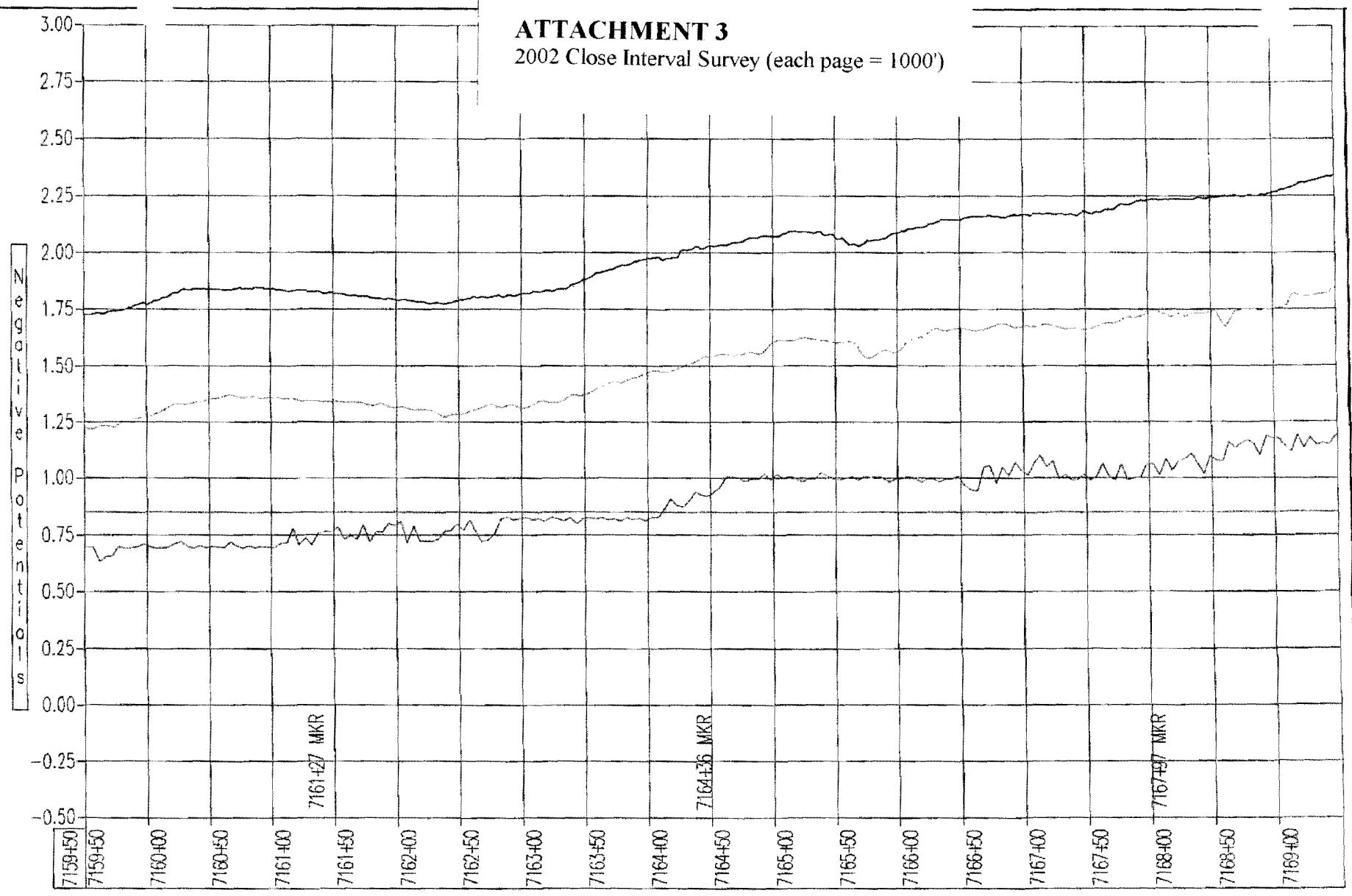
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| 139.87 | 139.887 | Telephone | 06/11/2007 | TRUE | 0.100 | FALSE | 0.100 | POS | RA | |
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| 139.87 | 139.887 | Telephone | 04/02/2008 | TRUE | 0.392 | FALSE | 0.392 | pos | mew | |
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ATTACHMENT 2

Bond current showing return current to Plains

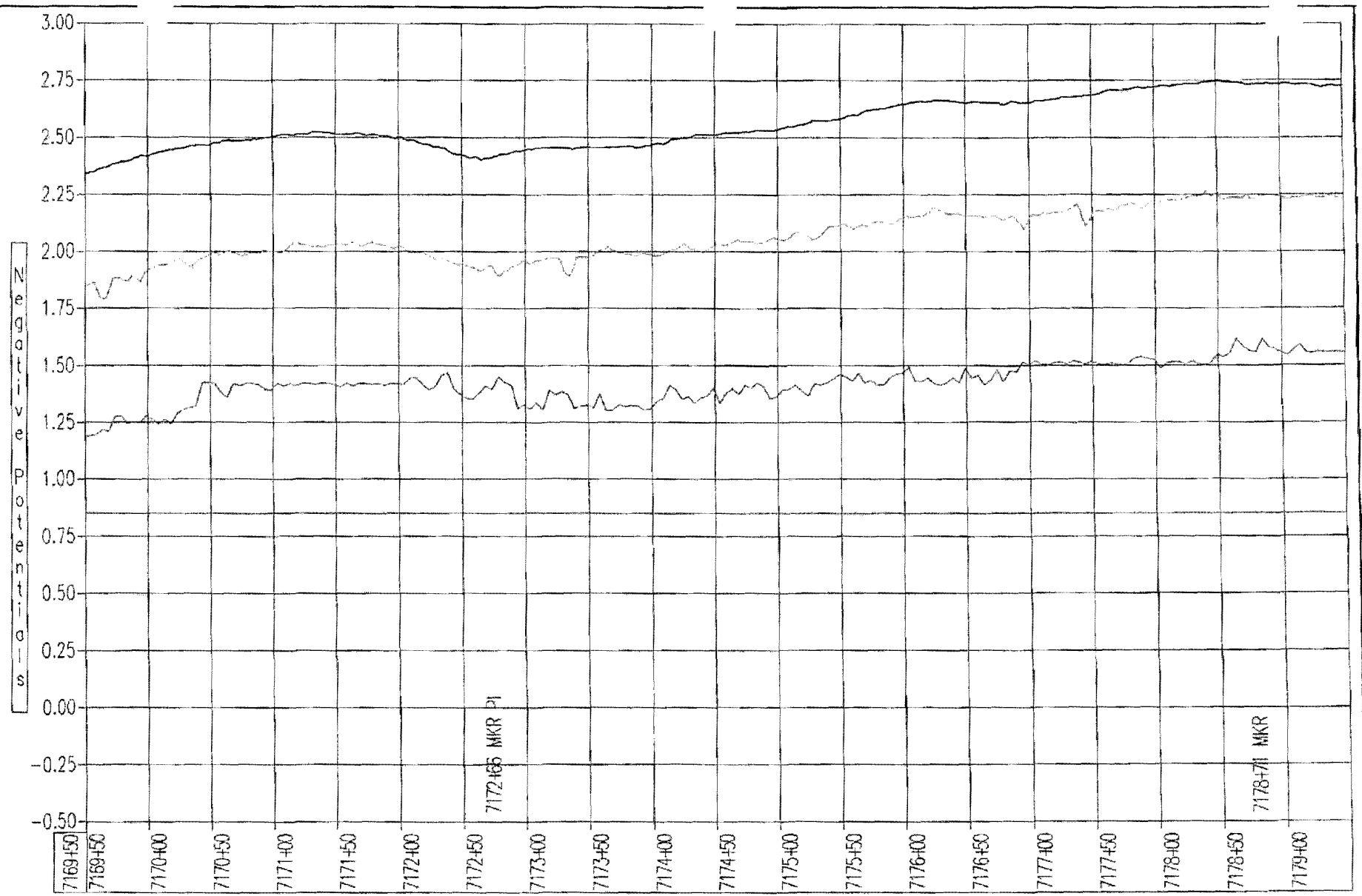
ATTACHMENT 3

2002 Close Interval Survey (each page = 1000')



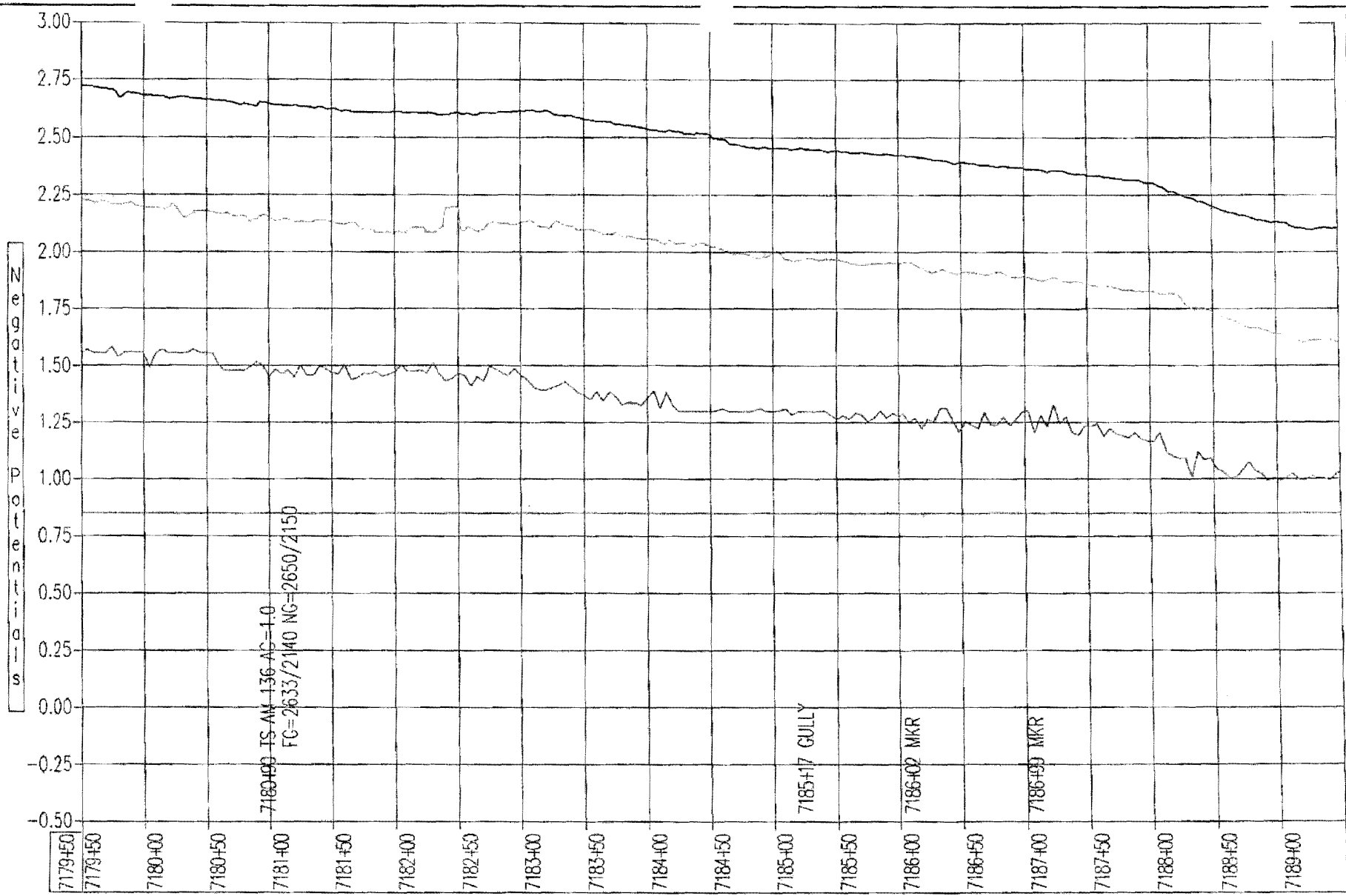
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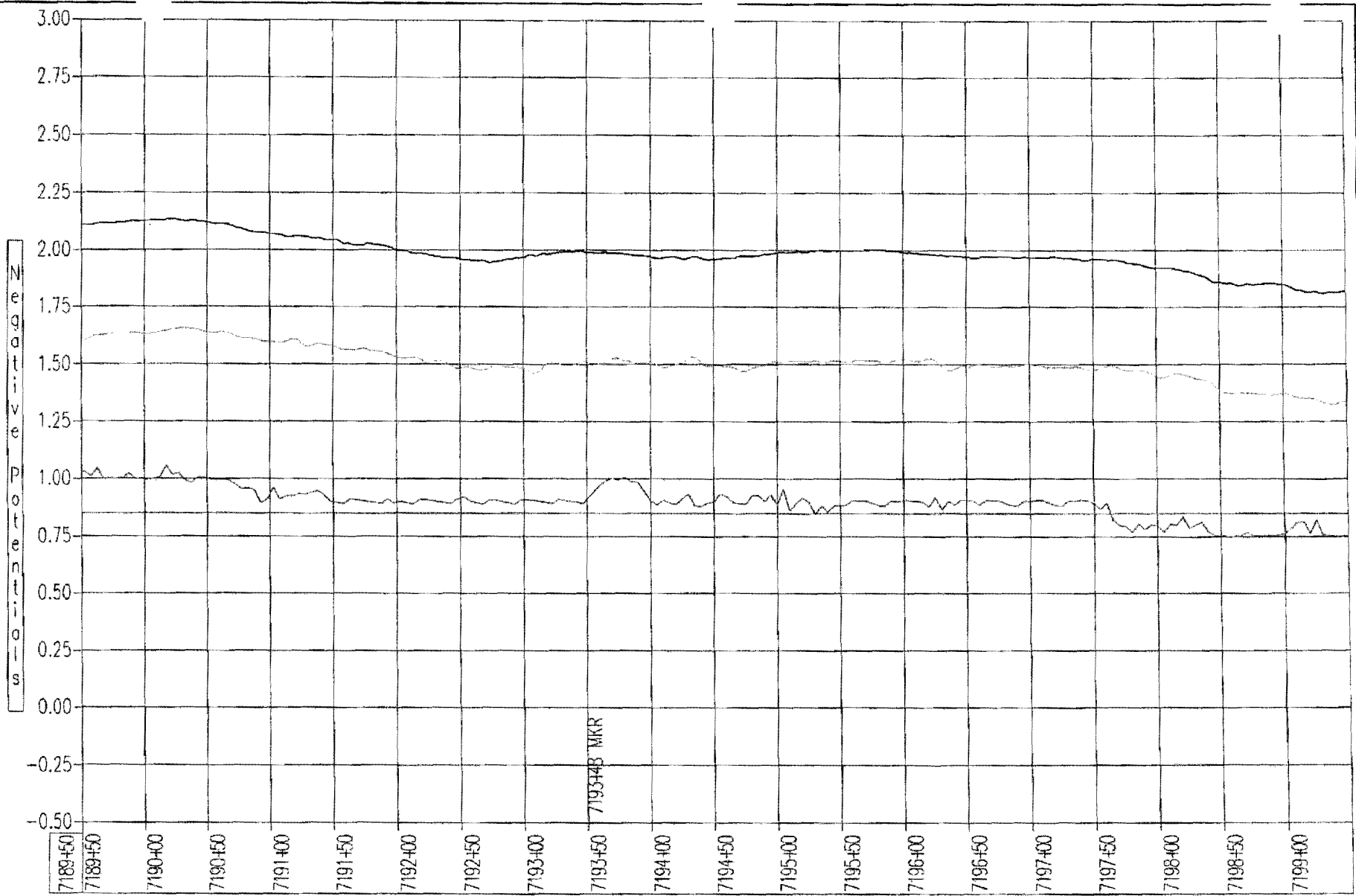
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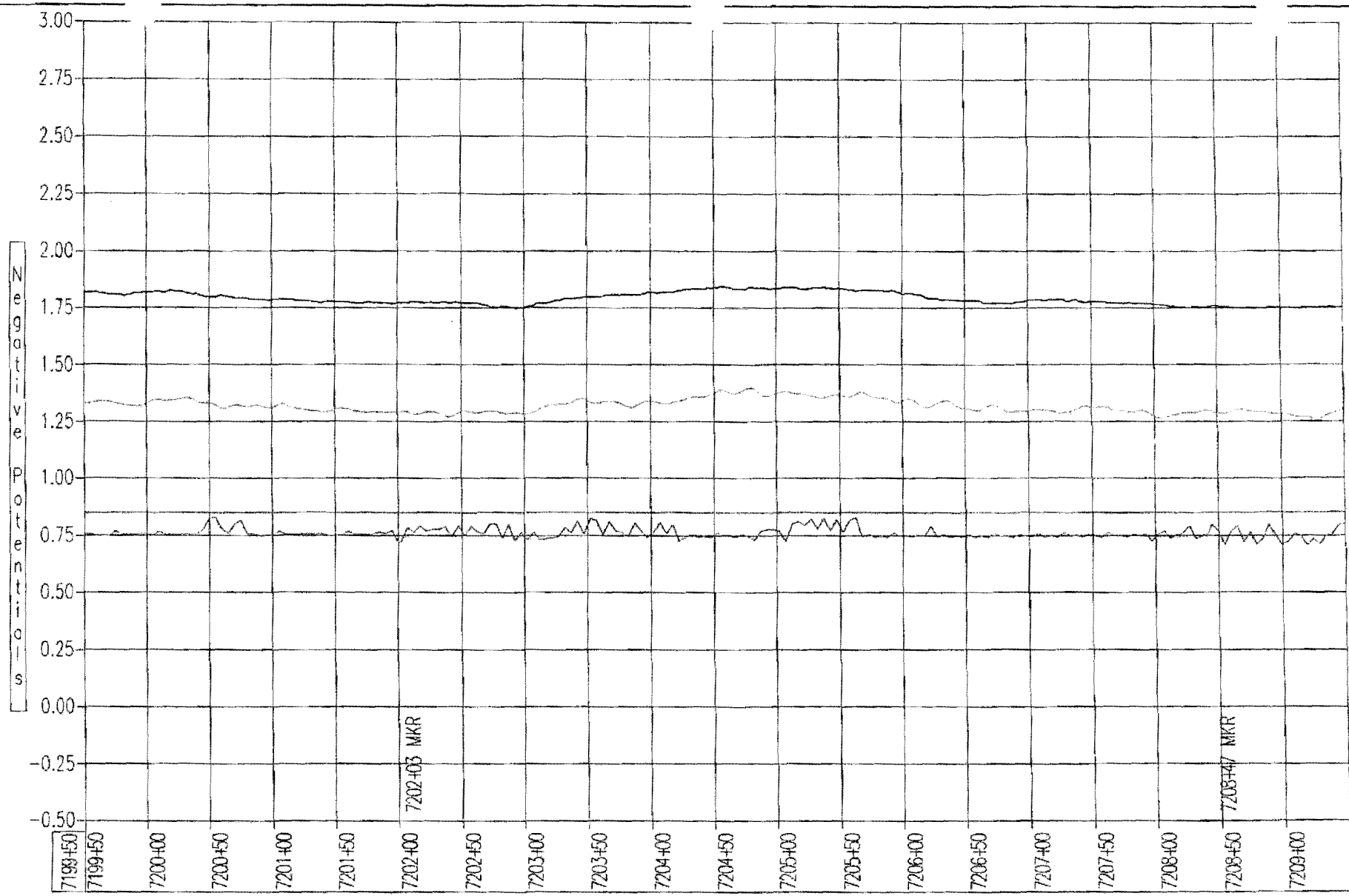
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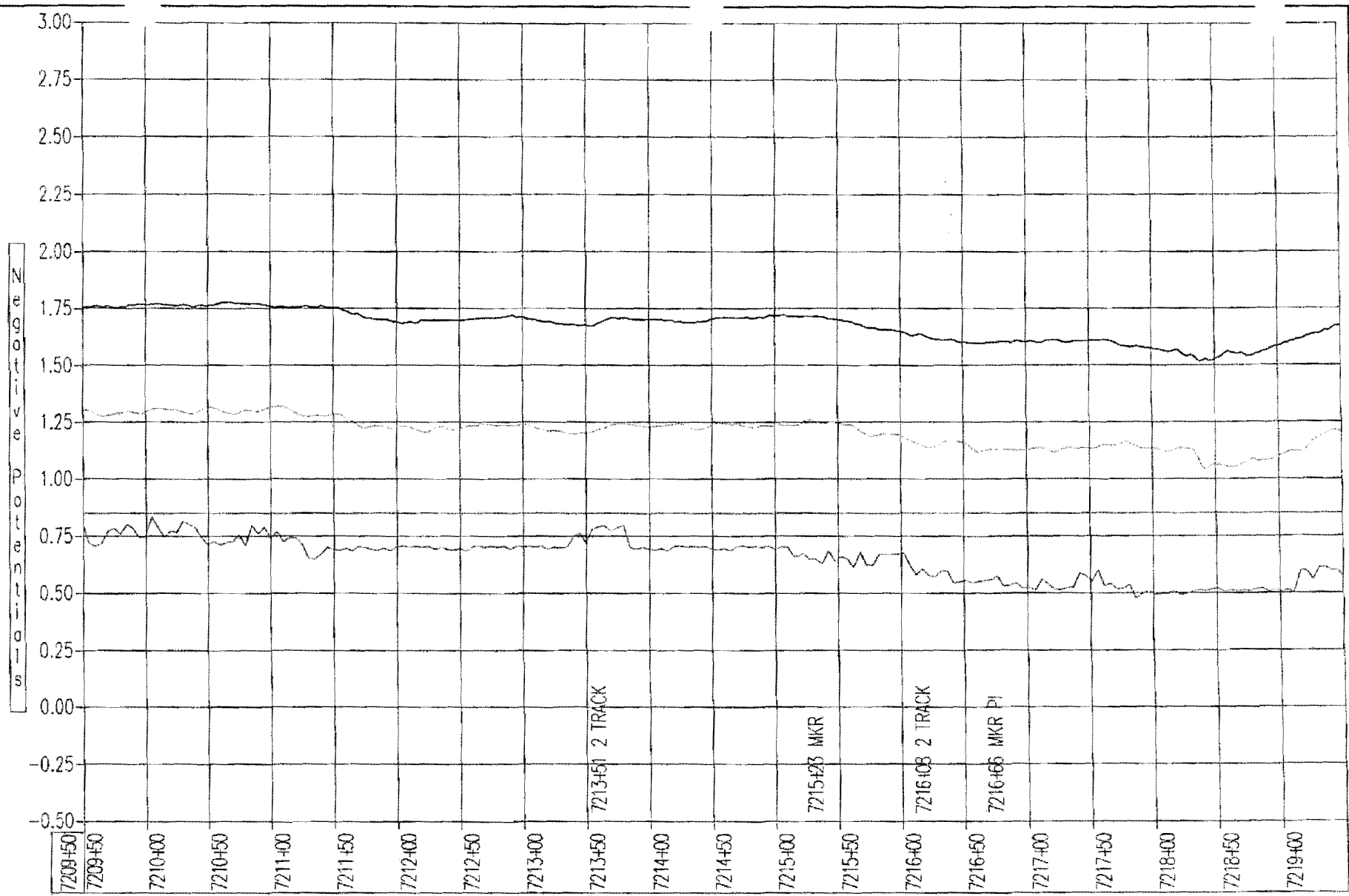
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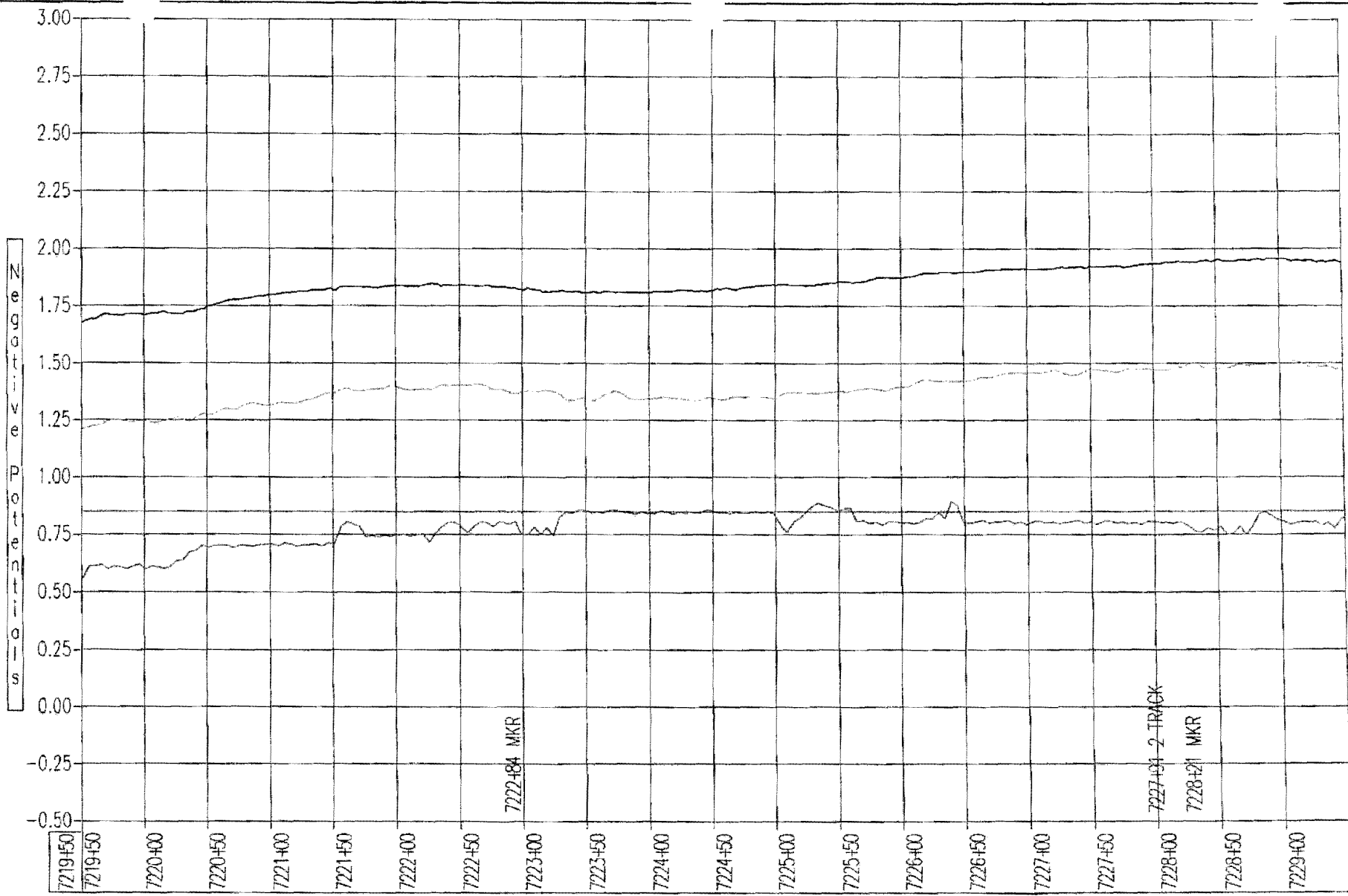
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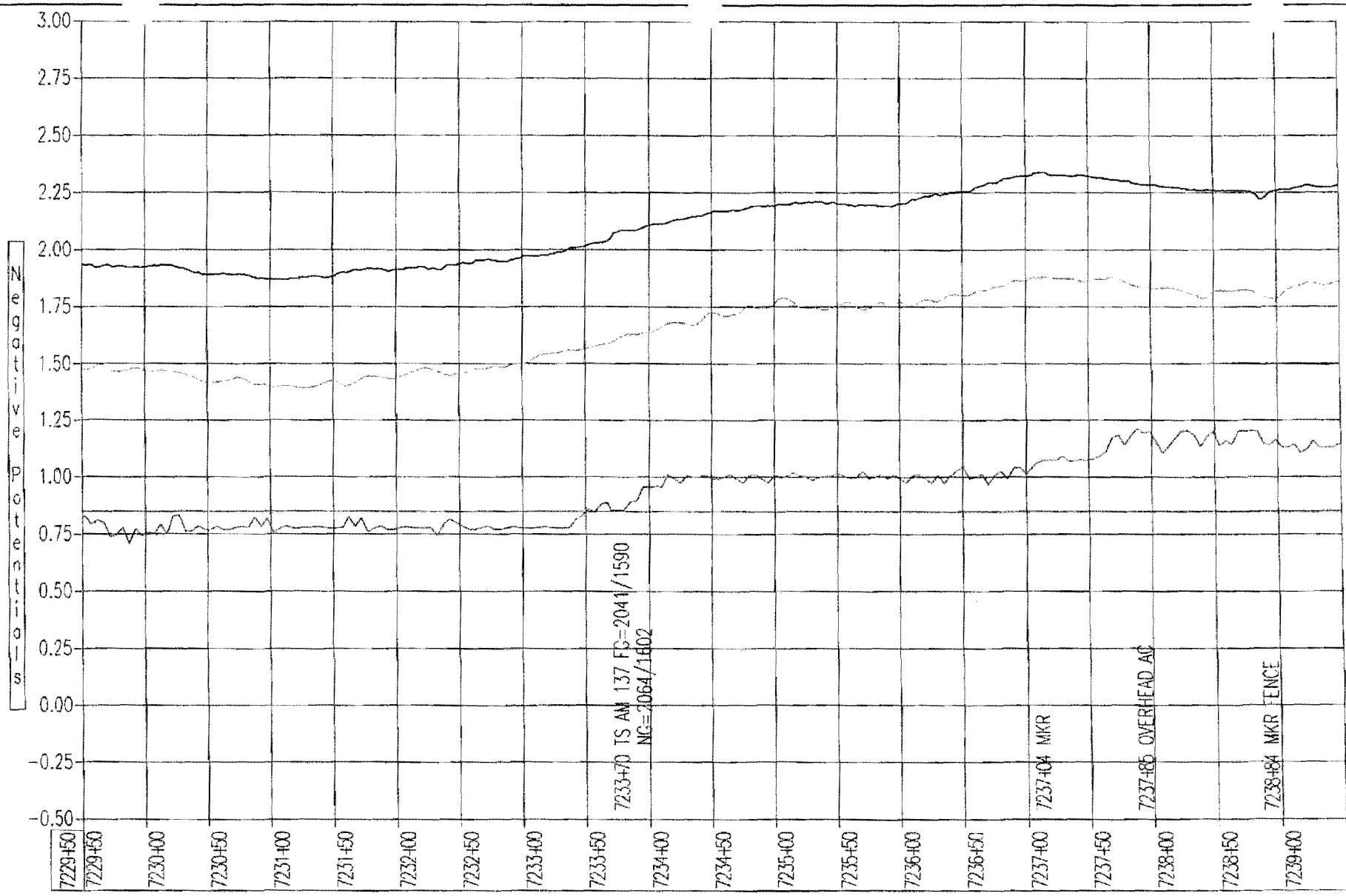
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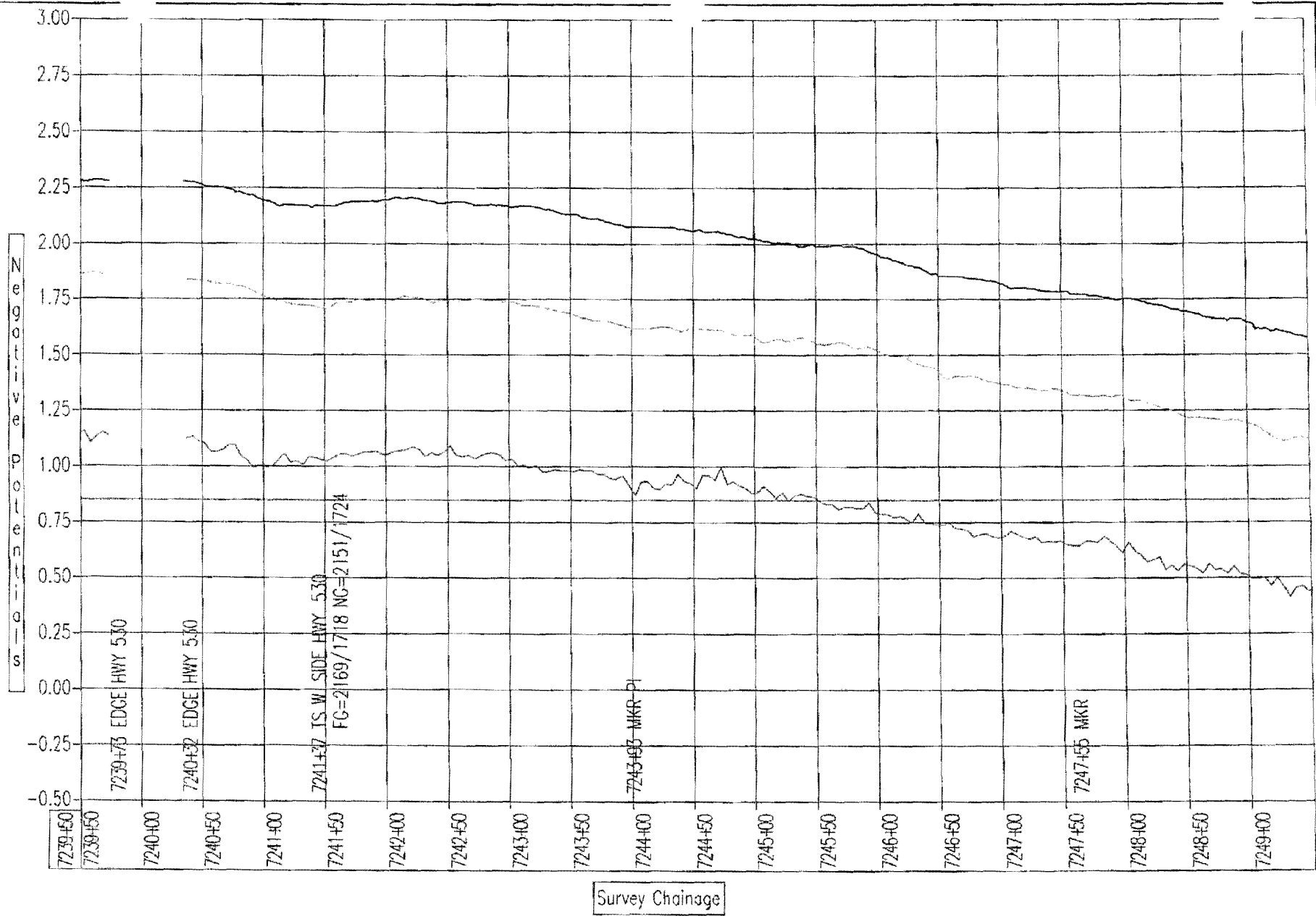
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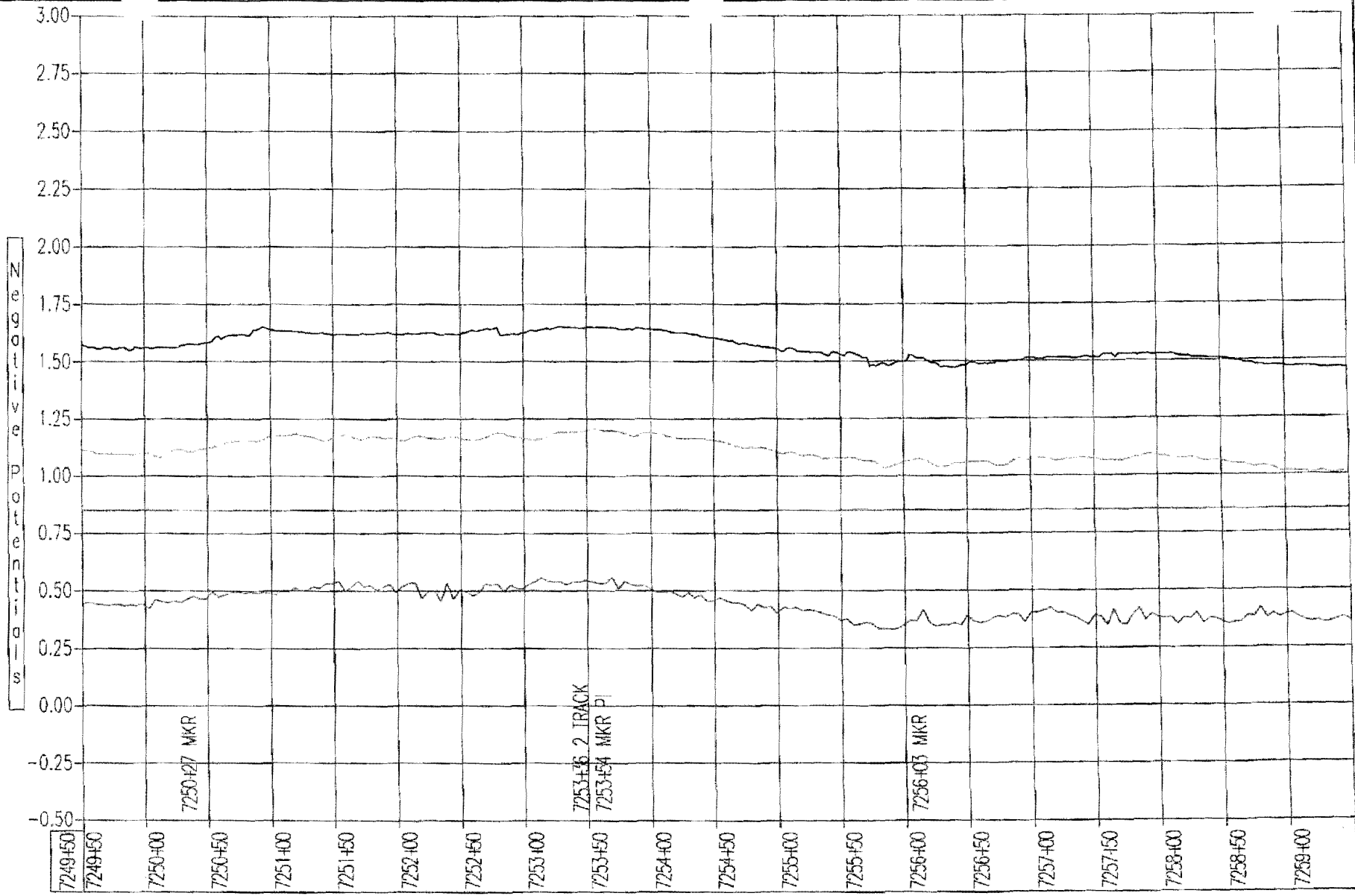


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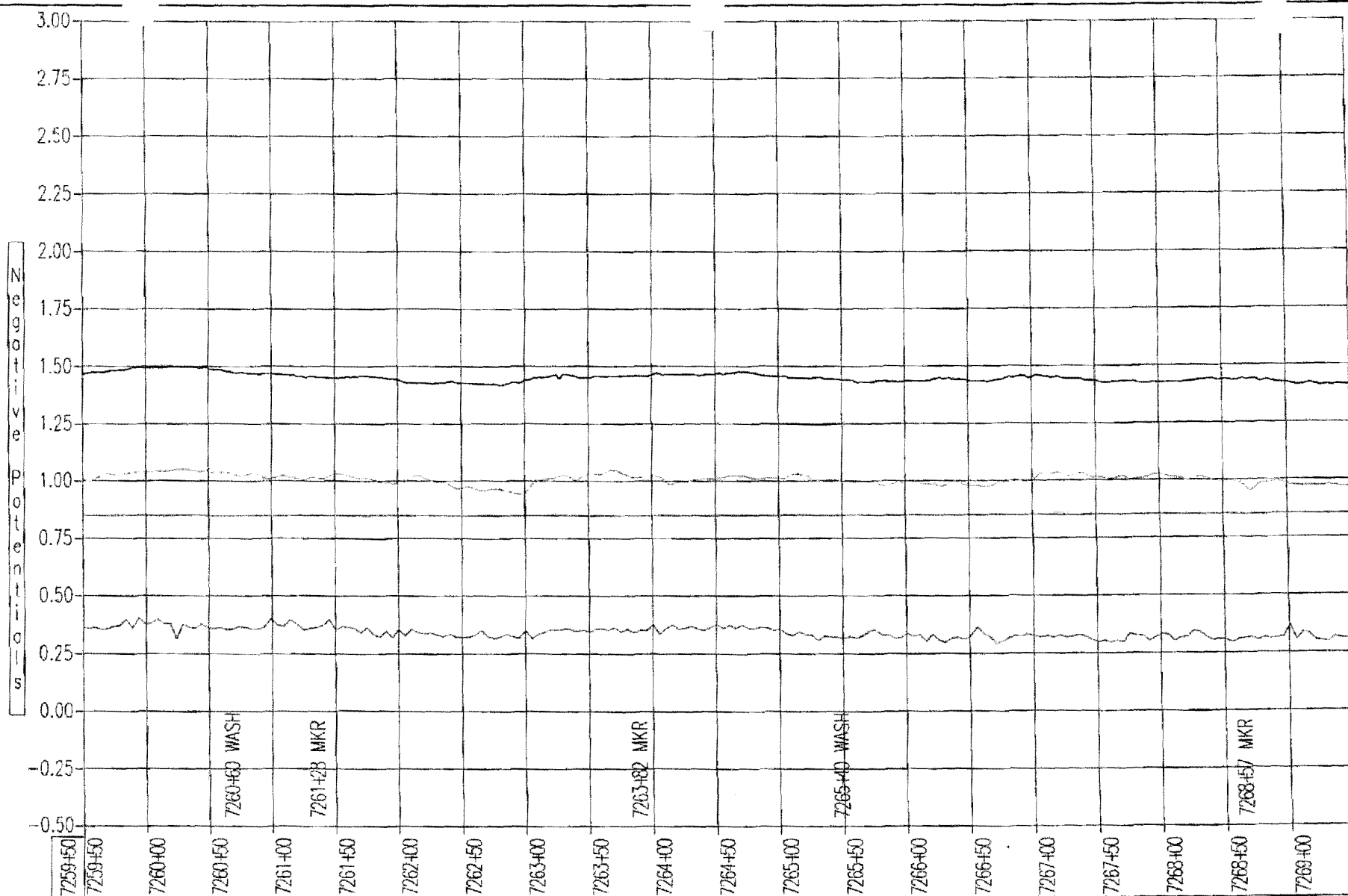


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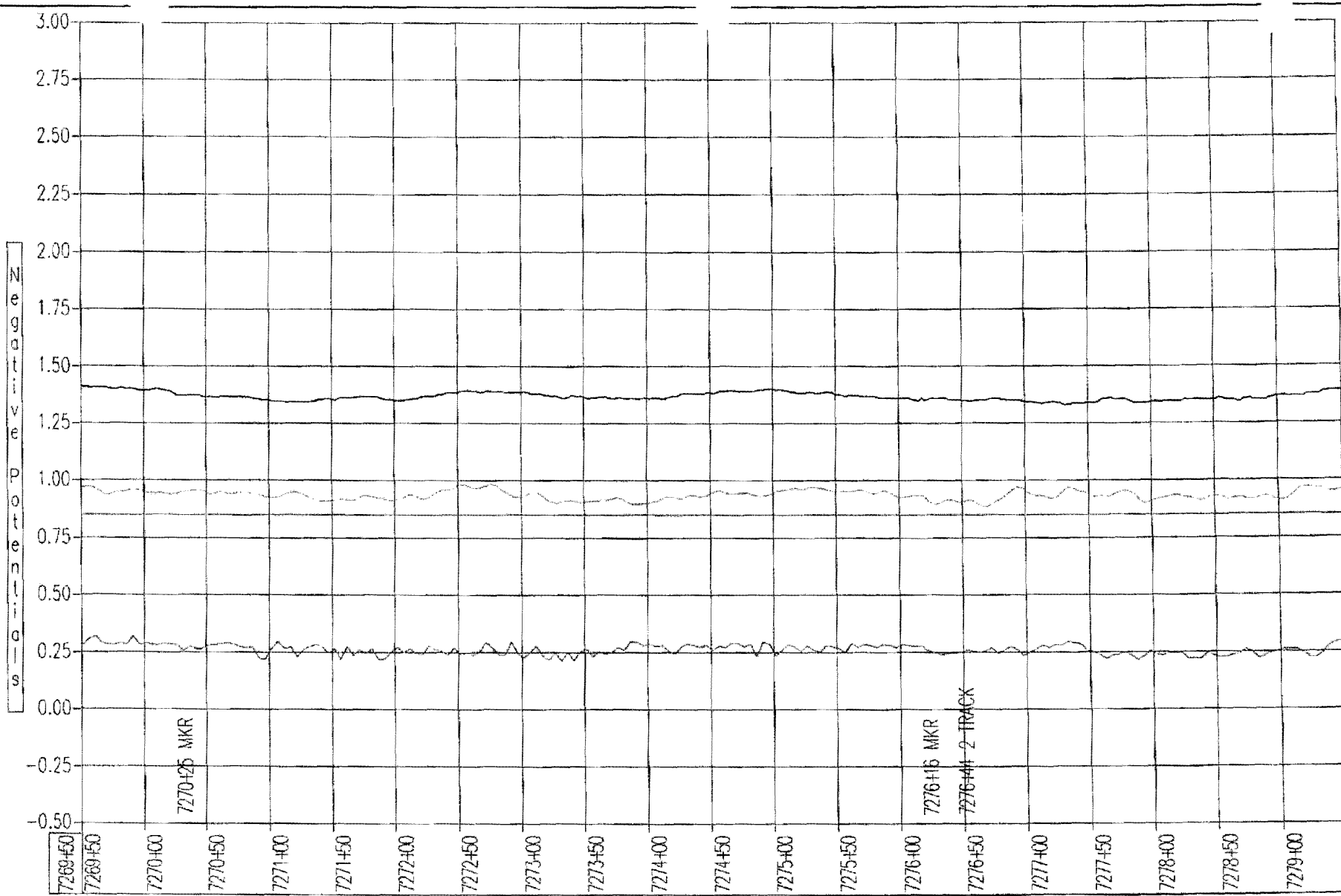
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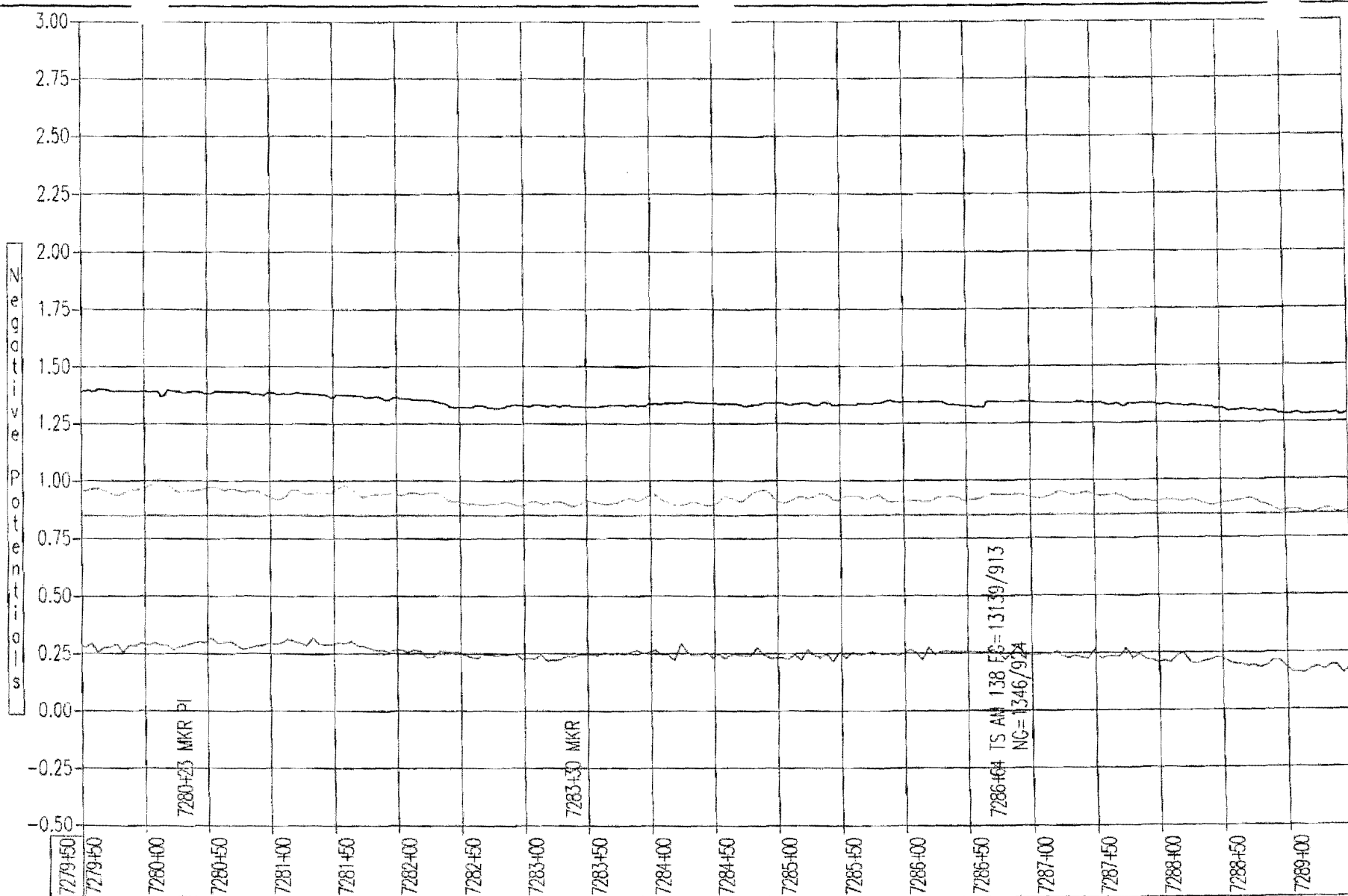


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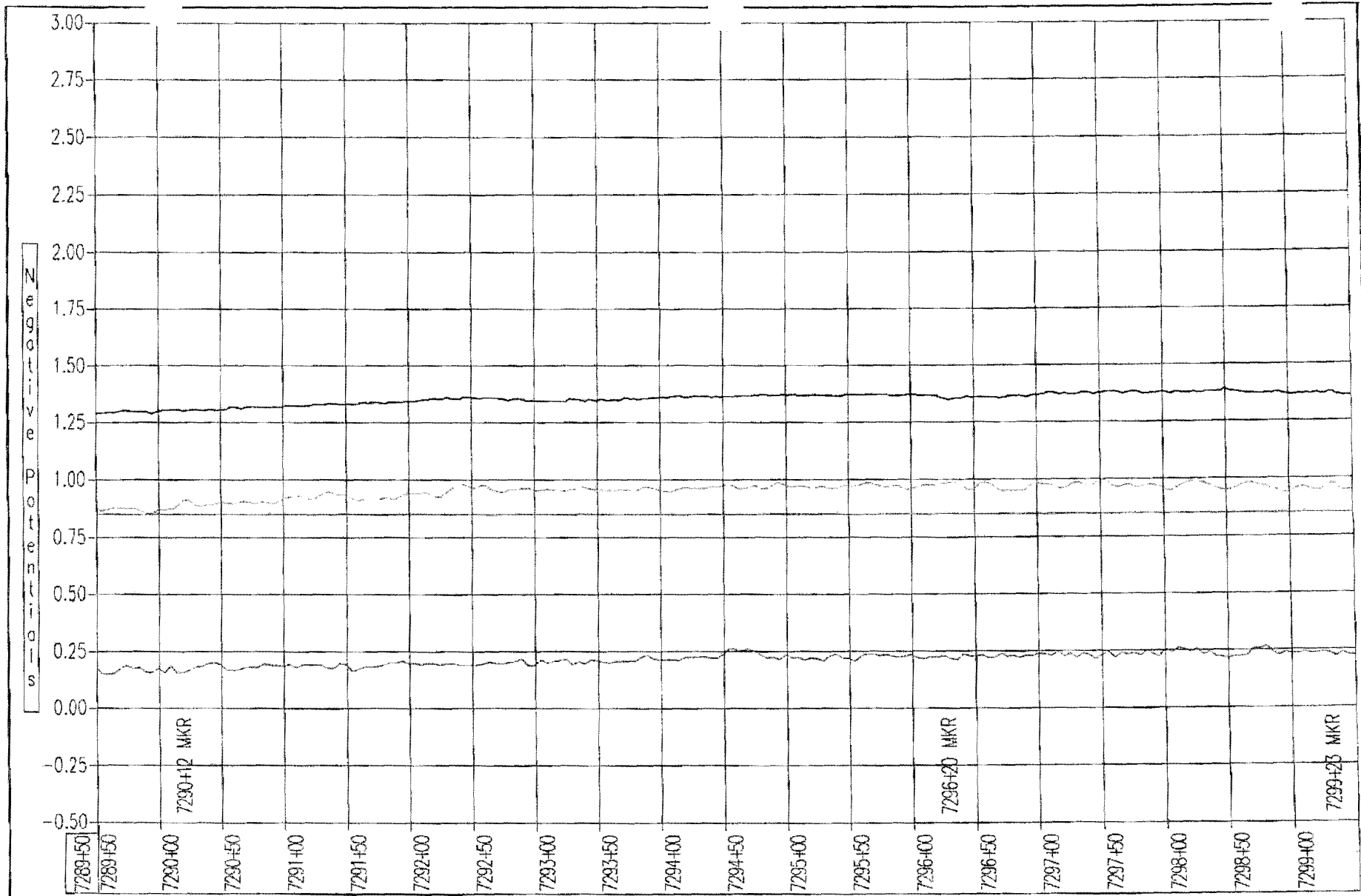


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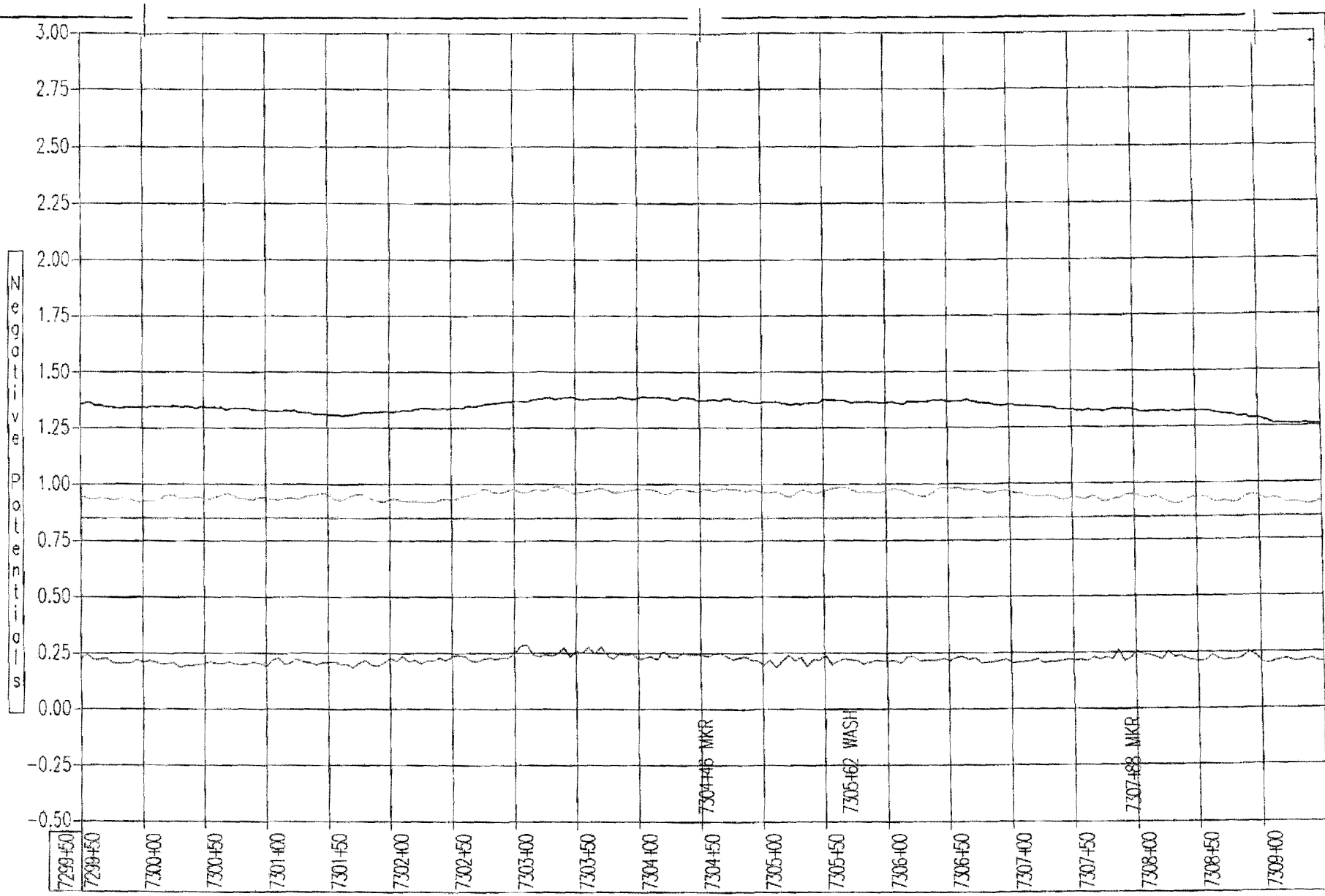
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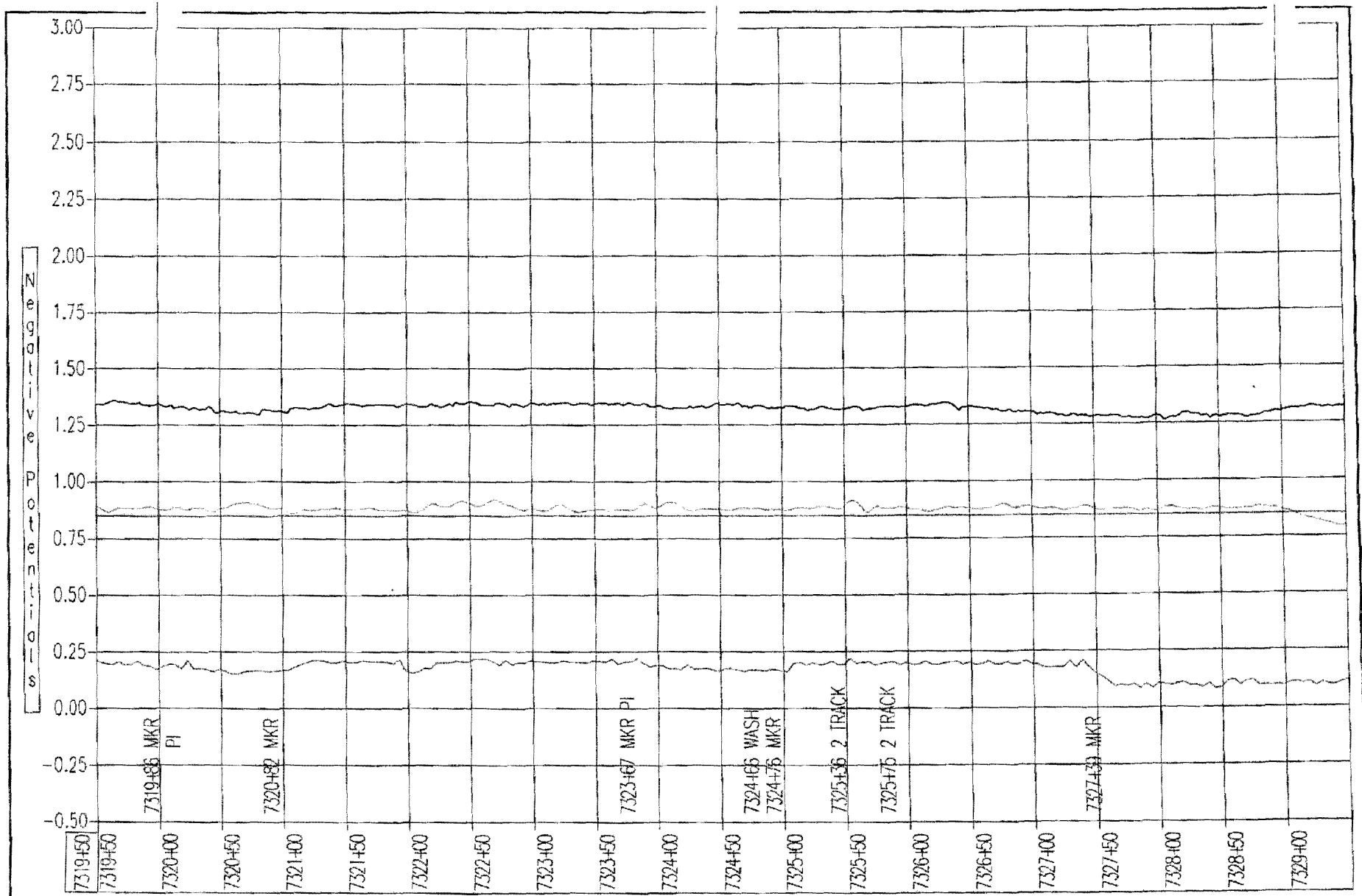
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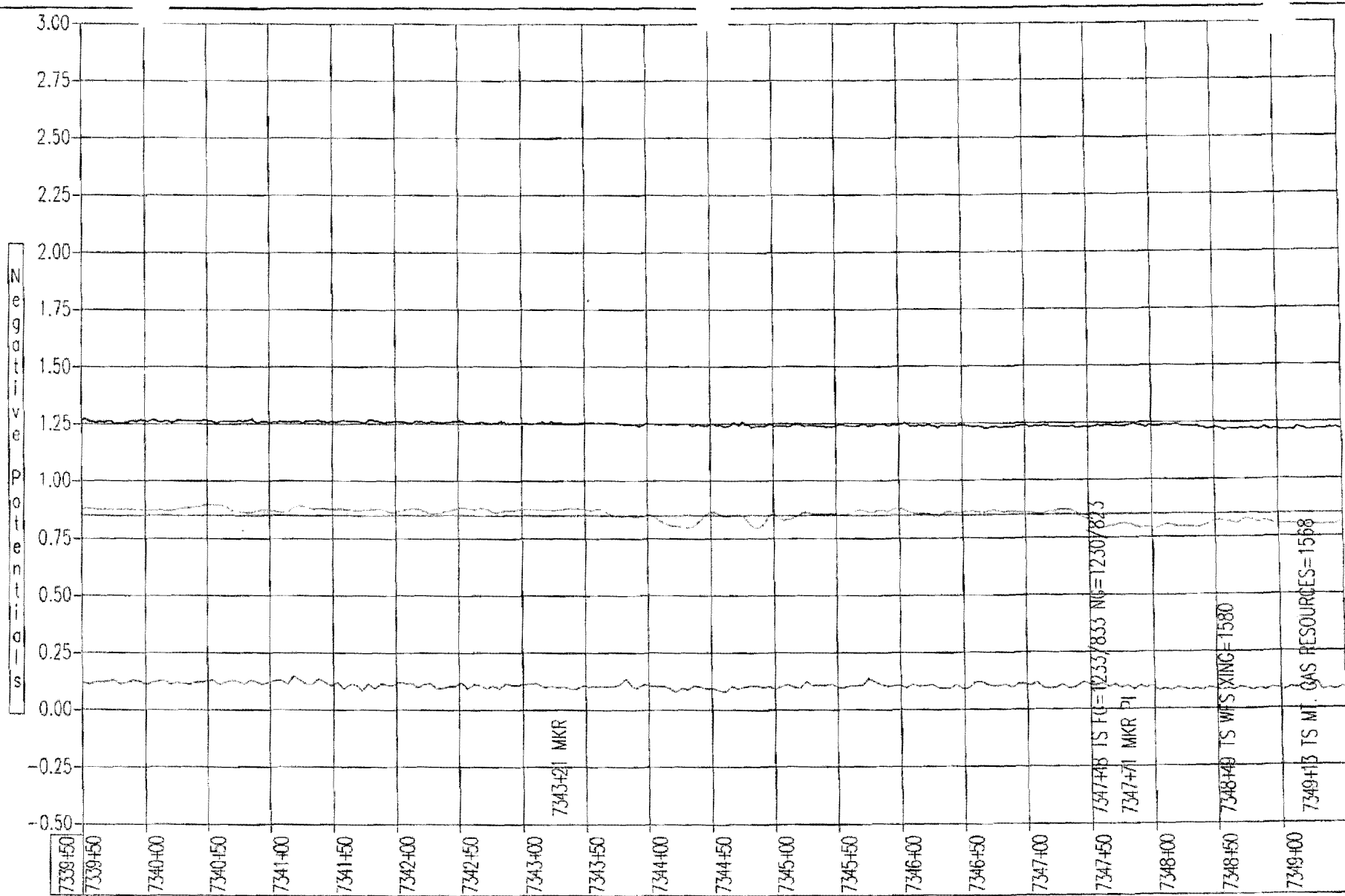
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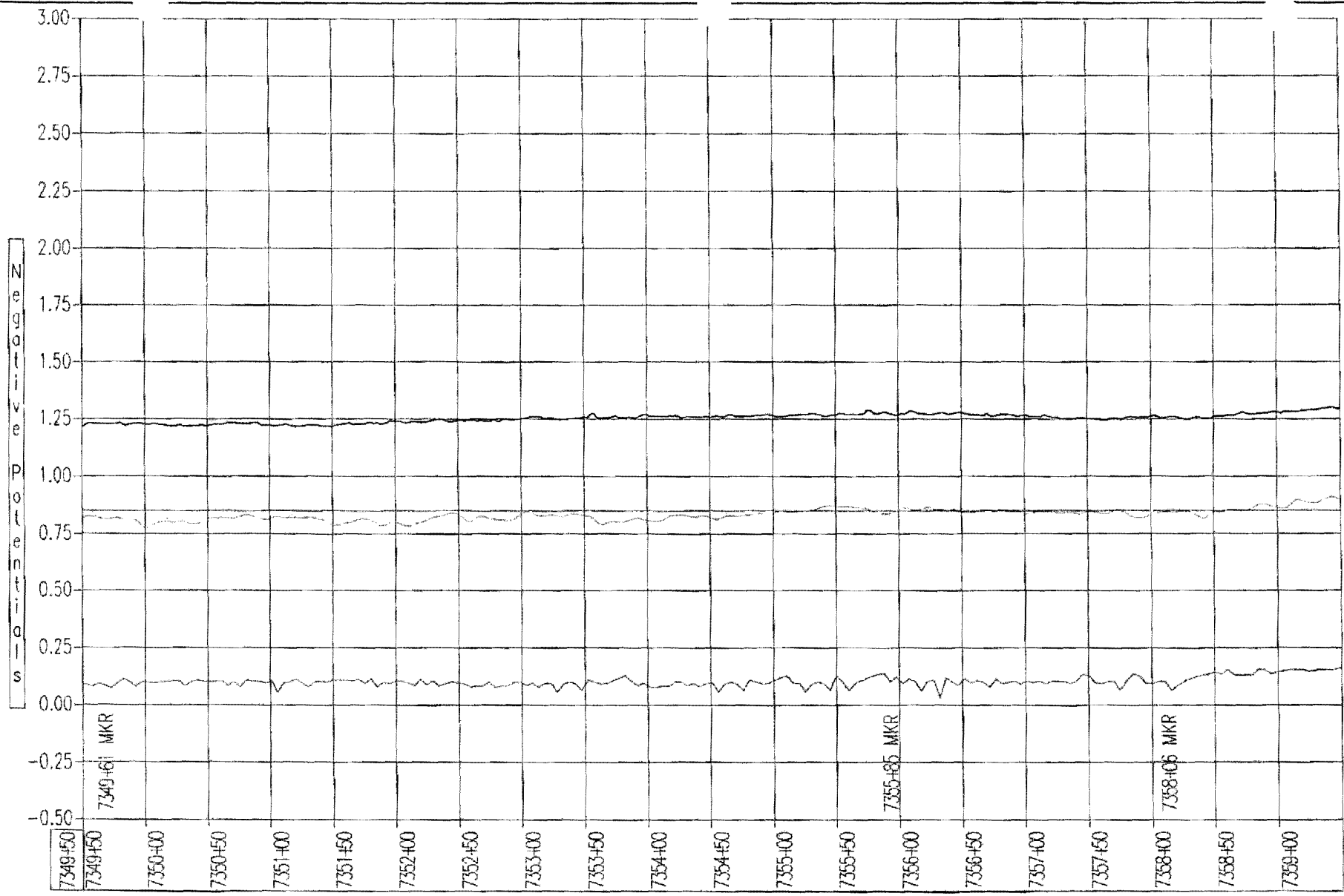
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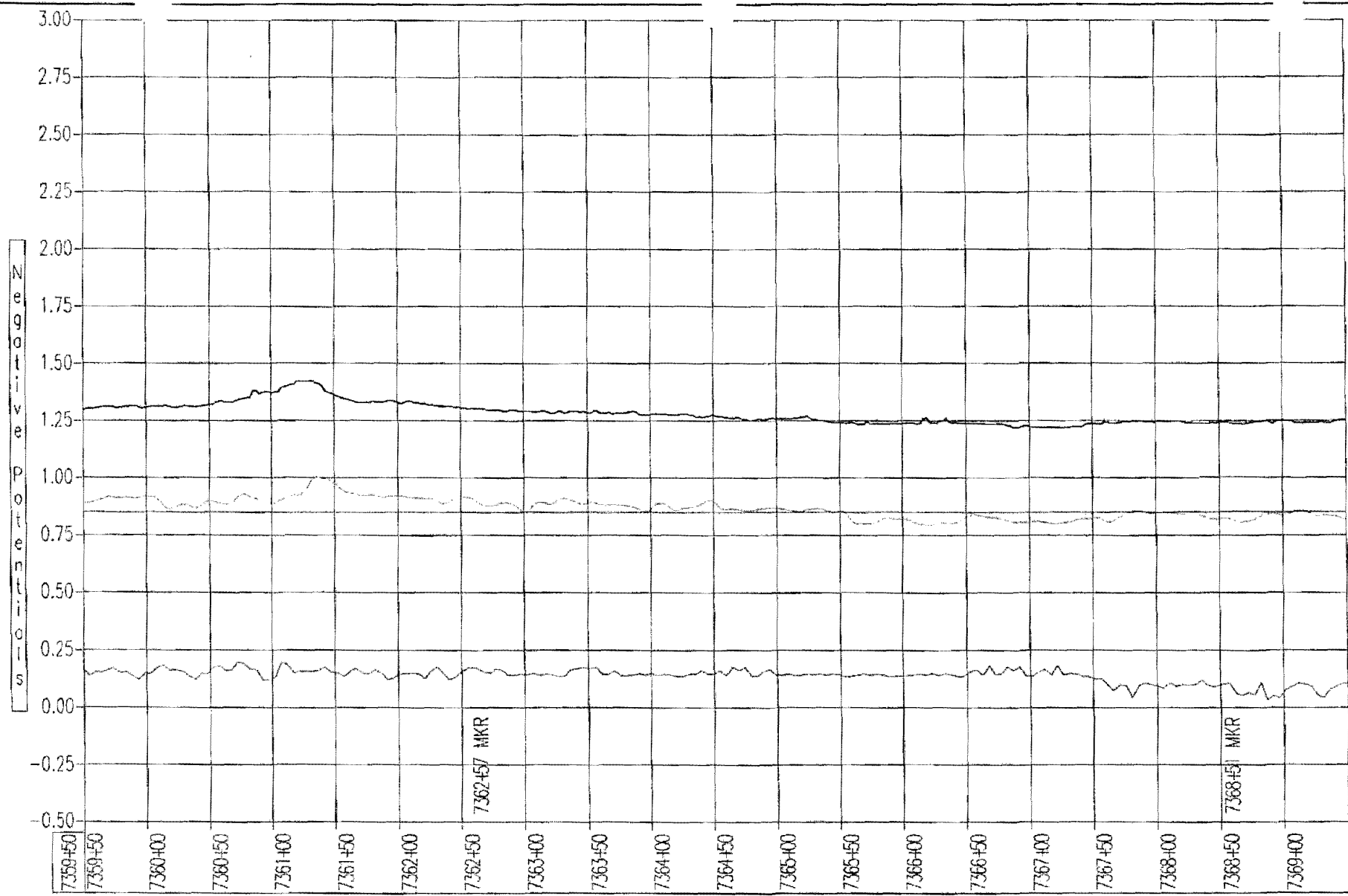
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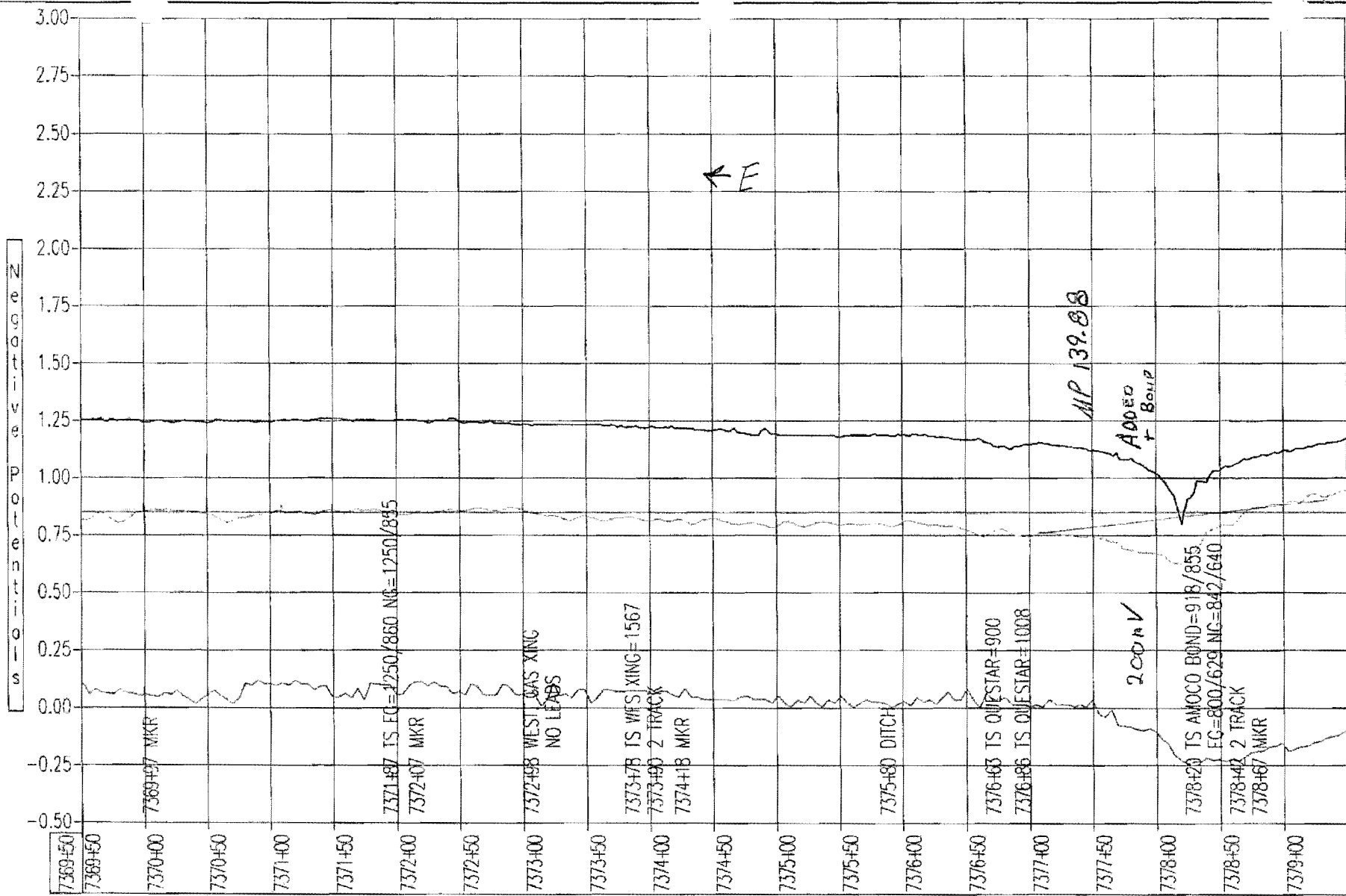
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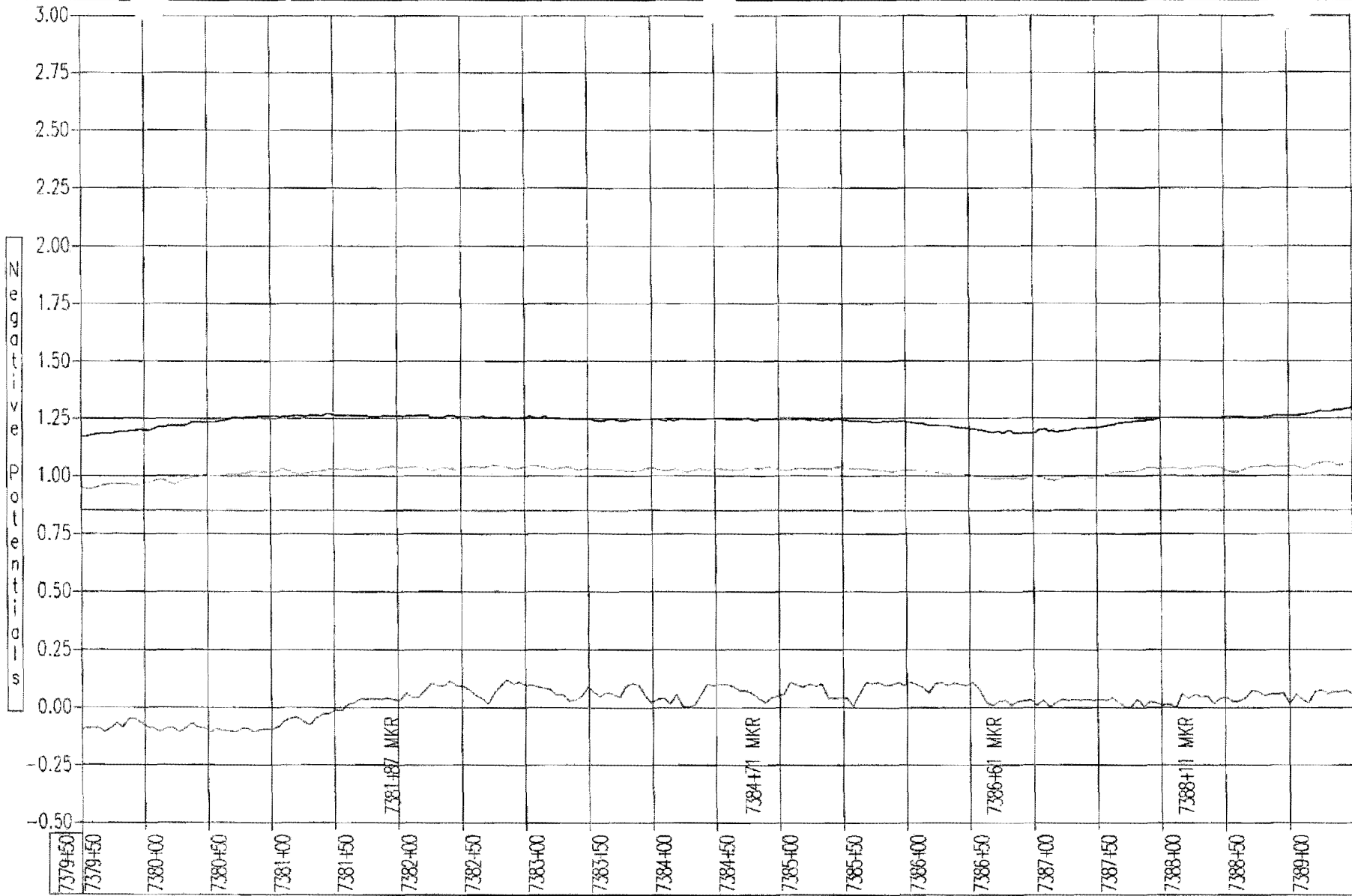
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