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November 19, 2009

Mr. Ivan Huntoon
 Director
 Central Region
 U.S. Department of Transportation
 Pipeline and Hazardous Material Safety Administration
 901 Locust Street, Suite 462
 Kansas City, Missouri 64106-2641

Via UPS Delivery
Tracking # 1Z78E33X1594387197

RE: Request for Hearing
Explorer Pipeline Company - CPF 3-2009-5018

Dear Mr. Huntoon:

Explorer Pipeline Company (Explorer) is requesting a hearing that will be represented by counsel to contest Notice of Probable Violation (NOPV) CPF 3-20090-5018 on the issue §195.573 is not applicable. The pipelines listed in the NOPV satisfy the low-stress exception in §195.1(b)(4).

A low-stress pipeline that serves refining, manufacturing, or truck, rail, or vessel terminal facilities, if the pipeline is less than one mile long (measured outside facility grounds) and does not cross an offshore area or a waterway currently used for commercial navigation.

The two (2) 1,362-foot pipeline segments identified as "St. Louis Meter Station to J.D. Streett" meet the requirements for this exception. A 14-inch pipeline originates at Explorer's Wood River, Illinois Tank Farm and terminates at Explorer's St. Louis, Missouri Meter Station. The segments in question are separate delivery lines to the J.D. Streett facility. The station is equipped with a receiver and a control valve that isolates the meter station's in-plant piping from the 14-inch pipeline. The 14-inch pipeline and the J.D. Streett low-stress delivery lines are represented as separate line segments in Explorer's National Pipeline Mapping System (NPMS) and the J.D. Streett line segments are classified as less than 20 percent SMYS in Part F of PHMSA's annual report form F 7000-1.1. These governmental representations and certifications are based on the above exception definition.

Explorer delivers to 3 shippers out of the meter station, of which Explorer owns and operates 2 of the 11 low-stress delivery lines. The other 9 low-stress delivery lines are owned and operated by the shippers. The 2 low-stress delivery lines Explorer owns and operates serve a truck facility identified as the J.D. Streett Products Terminal.

Low-Stress Summary	
Length – Less than 1 mile St. Louis Meter Station to J.D. Streett	Yes
Serves Refining, Manufacturing, Truck, Rail or Vessel Terminal	Yes
Crosses Offshore Area	No

Crosses Navigable Waterway	No
SMYS	52,000 psi
MOP	275 psi
Wall Thickness	0.250 inch
100% SMYS	$[2St/D] = [2 \times 52,000 \times .250 / 14] = 1,857.14$ psi
20% SMYS	371.40 psi

Explorer committed to the PHMSA representative that although the J.D. Streett delivery lines were classified as low-stress, Explorer would ensure they met or exceeded NACE criteria. Explorer additionally committed to reassessing both of the low-stress lines by hydrostatic testing and the replacement of the insulating kits at J.D. Streett.

Explorer has completed the hydrostatic tests and replaced the J.D. Streett insulating kits. In addition, Explorer has replaced two buried insulating flanges with welded sections of pipe at the meter station's fence line. Additionally, the CP system was extensively re-evaluated and the CP test locations were re-stationed. The potentials for the two 1,362-foot low-stress delivery lines are now well within NACE criteria. Below is the most recent CP survey:

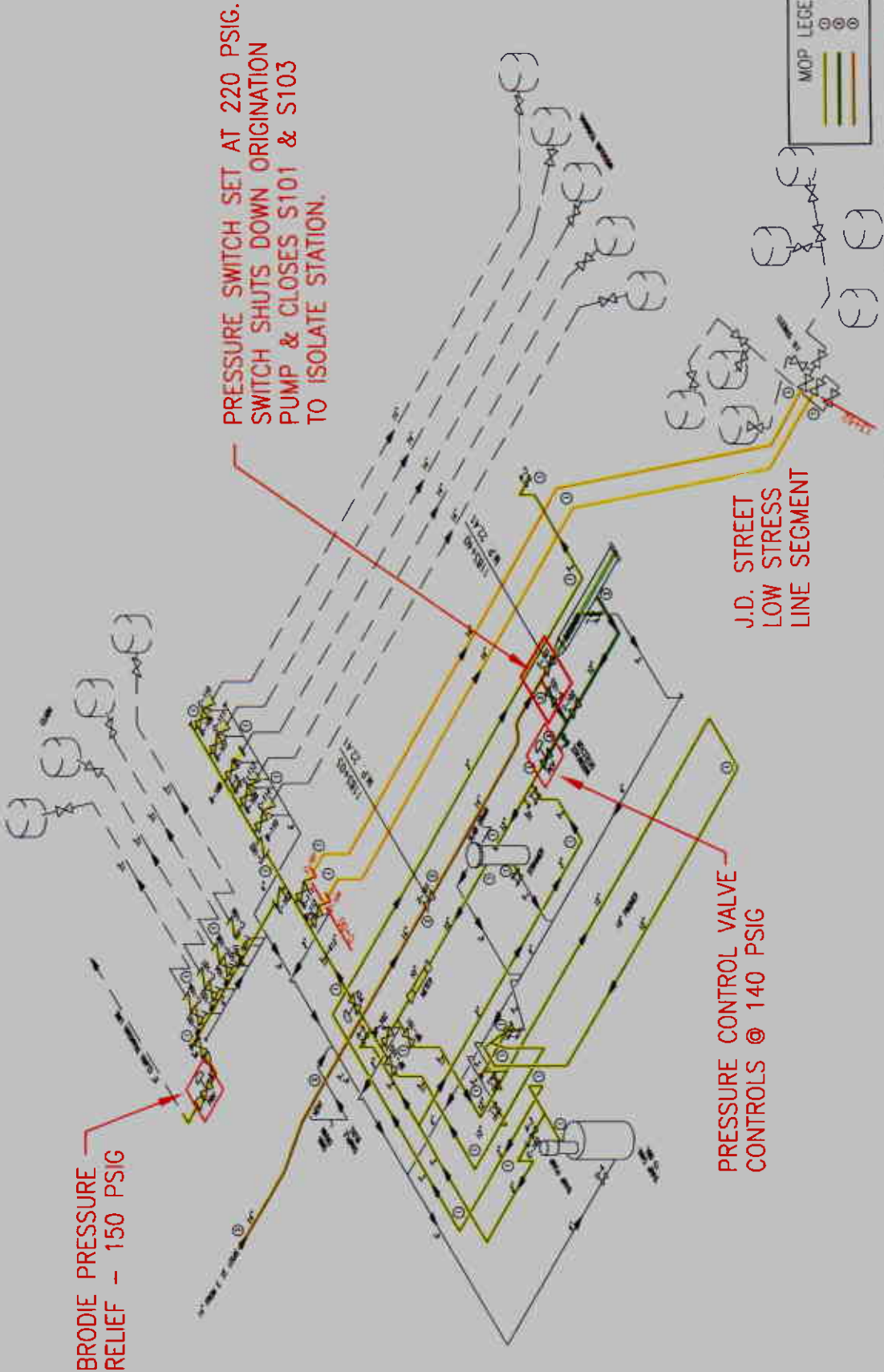
West Line			East Line		
Location/Station	Date	Reading	Location/Station	Date	Reading
0+03 Insulating Flange 0+00 (new stationing)	9/16/09	3.20	0+03 Insulating Flange 0+00 (new stationing)	9/16/09	3.37
1+27 Test Station 1+53 (new stationing)	9/16/09	3.48	1+27 Test Station 1+53 (new stationing)	9/16/09	3.66
5+45 Test Station 5+52 (new stationing)	9/16/09	2.44	5+45 Test Station 5+52 (new stationing)	9/16/09	2.40
9+53 Test Station 13+00 (new stationing)	9/16/09	2.44	9+53 Test Station 13+00 (new stationing)	9/16/09	2.40
10+12 Insulating Flange 13+62 (new stationing)	9/16/09	1.78	10+12 Insulating Flange 13+62 (new stationing)	9/16/09	1.92



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Attachment

CC: Rod Sands, Tulsa
Curtis Craig, Tulsa
Jim Sieck, Tulsa
Tom Jensen, Tulsa
Jeff Wenzell, Tulsa
Michael Stackhouse, Tulsa



BRODIE PRESSURE RELIEF - 150 PSIG

PRESSURE SWITCH SET AT 220 PSIG. SWITCH SHUTS DOWN ORIGINATION PUMP & CLOSES S101 & S103 TO ISOLATE STATION.

PRESSURE CONTROL VALVE CONTROLS @ 140 PSIG

J.D. STREET LOW STRESS LINE SEGMENT

MOP LEGEND

—	275 PSIG
—	1240 PSIG
—	1537 PSIG

ST. LOUIS WATER DEPARTMENT

ST. LOUIS STATION ISOMETRIC

DATE	BY	CHKD	APP'D

PROJECT NO. 471-M5-0001

DATE 11/17/08

SCALE 1" = 100'

NO. 471-M5-0001-01