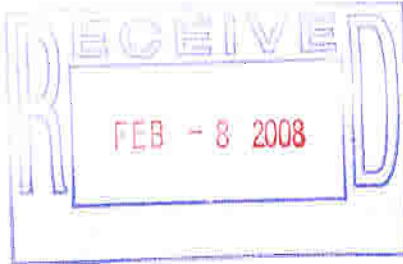




Centurion Pipeline L.P.

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Houston, Texas 77046-7570
Phone 713.215.7301 Fax 713.350.4783



February 7, 2008

Mr. R. M. Seely
Director Southwest Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Administration
8701 South Gessner, Suite 1110
Houston, TX 77074

Re: Office of Pipeline Safety (OPS) Inspection Report
Request for Notification of Amendment
CPF No. 4-2007-5047M

Dear Mr. Seely:

This submittal is a response to your letter of December 12, 2005 requesting Centurion Pipeline to review and amend its Operations and Maintenance Manual to address requirements of Section 195.571 of the regulations.

Centurion revised its manual and associated procedures to reflect how it will account for IR drop considerations for the (-850 mV) on-criteria. The relevant revisions are attached in printed form (Attachment 1/ O&M Manual Provision and Attachment 2/ O & M Procedure), and additionally provided in electronic format to Mr. Chris McLaren of your office.

Centurion believes the revisions adopted will achieve the agency's objectives. The review of our plan and its implementation is appreciated, and the recommendations provided during and after the inspection were constructive. Centurion is committed to the continual improvement of its plan going forward in a rapidly changing regulatory environment, and recognizes the improved pipeline safety which has resulted to date.

Please call me at (713) 215-7379 to discuss any concerns or further revisions DOT may propose.

Sincerely,

Wm. R. Von Drehle
Director, HES/Regulatory/Compliance
Centurion Pipeline L.P.
5 Greenway Plaza, Suite 110
Houston, TX 77046

Determine Adequacy of Cathodic Protection - # P-195.571

Description	The criteria which will be used to determine adequacy of cathodic protection shall comply with the applicable criteria contained in paragraphs 6.2 and 6.3 of NACE Standard RP0169-2002. The procedure describes steps to validate use of 100 mV shift, where demonstrated appropriate (see Step 2 of <i>Procedure Steps</i> , page 2).
Applies to	All DOT pipelines that utilize cathodic protection.
Frequency	12 Months not to exceed 15 months.
Safety and Environmental Precautions	N/A
Reference	49 CFR 195.571 What criteria must I use to determine the adequacy of cathodic protection?
Prerequisites	In order to complete this task, you must be qualified under the company's Operator Qualification Plan or be supervised by someone who is qualified.
Forms	Update maps as needed.
Related Procedures	P-195.573 (a) "Monitor External Corrosion Control-Protected Pipelines"

Procedure Steps

ASSESS ADEQUACY OF CATHODIC PROTECTION CONSISTENT WITH NACE RP 0169

1. Conduct Polarized Potential Survey

Conduct a polarized potential survey on the regulated pipeline segment test points at least once every three (3) years. Determine an IR drop correction value to be used on annual surveys. NACE RP 0169, 6.2.2.1.2 criteria should apply for this survey. If CP criteria is met for segment update annual CP survey documentation, and stop.

2. Conduct Depolarization Survey As Indicated

If the polarized survey potentials do not meet the requirements of RP0169 6.2.2.1.2, Conduct a depolarization survey. Utilize the static survey data to determine if the pipeline segment meets the 100mv shift criteria described in NACE RP 0169, 6.2.2.1.3. If pipeline meets 100 mv shift criteria, document adequacy and update annual CP survey results, and stop.

(If Criteria is still not met, corrective actions will be taken: such as- increasing rectifier output, or new cathodic protection ground bed installed.)

3. Install IR Free Test Station As Indicated

Based upon evaluations in (1) and (2) above, determine locations where additional monitoring is necessary. Install "IR Free" test station(s).

4. Review In-line Inspections (as applicable) to evaluate corrosion control effectiveness.

In addition to these actions, data shall be utilized from in-line inspections to assess the effectiveness of corrosion control systems as referenced in NACE RP 1069, 6.3.3 .

5. Conduct CIS Survey When Indicated

CIS surveys will be conducted when deemed necessary through readings obtained from surveys conducted (as referenced in Items 1, and 2). Reference 195.573 (a) (2).