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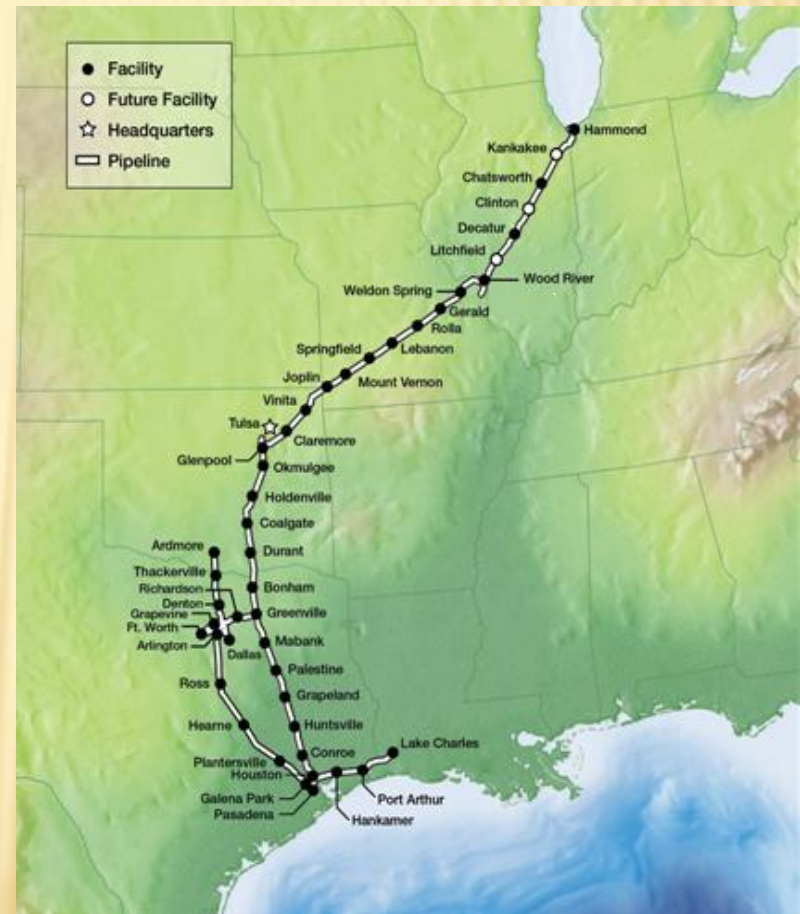
# INTEGRATED INSPECTION (II)

# INTEGRATED INSPECTION EXPLORER PIPELINE



## ✘ Explorer System Summary

- + 1,900 mile system from Lake Charles, Louisiana to Hammond, Indiana
- + Traverses Louisiana, Texas, Oklahoma, Missouri, Illinois and Indiana
- + Serves Houston, Dallas, Fort Worth, Tulsa, Saint Louis and Chicago markets
- + Connections serves 70 major population centers in 16 states
- + 28", 24" and 10" systems
- + Various size lateral lines



# INTEGRATED INSPECTION EXPLORER PIPELINE

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- ✘ Historical Standard PHMSA Inspections:
  - + Field and Records - every 2 years:
    - ✘ 2008, 2006, 2004, etc.
  - + Operations, Maintenance and Emergency (OM&E) Manuals - every 5 years:
    - ✘ 2007
  - + Integrity Management:
    - ✘ 2002 and 2005
  - + Operator Qualification:
    - ✘ 2004

# INTEGRATED INSPECTION EXPLORER PIPELINE

- ✘ PHMSA called to schedule II in 2009.
- ✘ My first question ...”*what’s an II?*”
  - + New program implemented in 2008.
  - + Only two previous liquid pipeline operators inspected with an II:
    - ✘ Plains – February to July 2008
    - ✘ Buckeye – May to December 2008
  - + Unified approach to performing standard cadre of inspections with more pre-inspection data gathering by PHMSA and priority placed upon the risks identified.
  - + The areas of focus were dependent upon PHMSA’s Operator Profile and responses to week one screening.

# INTEGRATED INSPECTION EXPLORER PIPELINE

- ✘ PHMSA and CYCLA Inspection Team:
  1. Mr. Chris McLaren, Southwest Region - Team Leader
  2. Mr. Allan Beshore, Central Region
  3. Mr. Robert Lee, Southwest Region
  4. Mr. J. Dallas Rea, Southern Region
  5. Ms. Karen Gentile, Eastern Region
  6. Mr. Jerry Davis, Western Region
  7. Mr. Lauren Clark, CYCLA
  8. Mr. David Kuhtenia, CYCLA

# INTEGRATED INSPECTION EXPLORER PIPELINE

## ✘ Eleven Modules Selected by PHMSA:

1. Reports (RP)
2. Facilities and Storage (FS)
3. Design and Construction (DC)
4. Maintenance and Operations (MO)
5. Assessment and Repair (AR)
6. Time Dependent Threats (TD)
7. CRM, SCADA, and Leak Detection (CR)
8. Risk Management (RM)
9. Training and Qualification (TQ)
10. Public Awareness and Damage Prevention (PD)
11. Emergency Preparedness and Response (EP)

# INTEGRATED INSPECTION EXPLORER PIPELINE

## ✘ Schedule of Events:

### + Six (6) calendar weeks - ten (10) weeks with sub-teams:

- ✘ April 6 to April 10, 2009 (1 week)
  - ✘ 300+ screening questions
- ✘ April 20 to April 24, 2009 (1 week)
  - ✘ Continue screening
- ✘ April 27, 2009 to May 1, 2009 (3 weeks)
  - ✘ PHMSA team splits into 3 sub-teams for office and field inspections
- ✘ May 11 to May 15, 2009 (2 weeks)
  - ✘ PHMSA Team splits into 2 sub-teams for field inspections
- ✘ May 18 to May 22, 2009 (2 weeks)
  - ✘ PHMSA Team split into 2 sub-teams for field inspections
- ✘ June 1 to June 5, 2009 (1 week)
  - ✘ One PHMSA team in the field

# INTEGRATED INSPECTION EXPLORER PIPELINE

- ✘ Explorer Pipeline's Records Centralized and Decentralized:
  - + Records in Tulsa, OK and
  - + District Offices:
    - ✘ Pt. Arthur, Texas
    - ✘ Houston, Texas
    - ✘ Arlington, Texas
    - ✘ Greenville, Texas
    - ✘ Glenpool, Oklahoma
    - ✘ Wood River, Illinois
    - ✘ Hammond, Indiana
  - + PHMSA followed historical Inspection Units for field inspections

# INTEGRATED INSPECTION EXPLORER PIPELINE

- ✘ Explorer Pipeline's Action Plan for II:
  - + Coordination of personnel – confirm responsibilities;
  - + Provide adequate time to respond and gather information and data for 300+ screening questions in 11 modules;
    - ✘ NOTE: Response to screening questions directs the inspections.
  - + Frequent status meetings; and
  - + Review and update personnel and project schedules to provide personnel resources - CP surveys and engineering project schedules modified to accommodate II.

# INTEGRATED INSPECTION EXPLORER PIPELINE

- ✘ Areas of Open and Detailed Dialogue with II Team:
  - + Integration schedule for recent acquisition into Explorer Pipeline's systems:
    - ✘ Integrity Management
    - ✘ Control Center/SCADA
    - ✘ Annual report (PHMSA Form 7000-1.1)
    - ✘ Projects and maintenance records
    - ✘ Tanks
    - ✘ Right-of-Way
  - + Safety Related Condition Reporting (SRCR) associated with an IM immediate repair/pressure reduction
    - ✘ PHMSA added FAQ - SRCR/IM immediate repair 10/15/2009
  - + Low-stress rule exception 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

# INTEGRATED INSPECTION EXPLORER PIPELINE

- ✘ Pros with II – Operator’s Perspective:
  - + Allows operator to complete all inspections in one year under single multi-week inspection
  - + Multi-regional approach introduced a new perspective
    - ✘ Explorer operates in Southwest *and* Central Region
    - ✘ II team included Western, Southern and Eastern Region



- ✘ Con with II – Operator’s Perspective:
  - + PHMSA can still request standard inspection following an II
  - + Heavy resource requirements for both Operator & PHMSA (6 - 10 weeks)
  - + Redundancies with questions – PHMSA continuously improving
  - + Questions provided only during screening week - allotment of time required to obtain data/files for other weeks
    - ✘ Example: Question involving a **1976** special permit

# INTEGRATED INSPECTION EXPLORER PIPELINE

## ✘ Lessons Learned:

- + Be prepared
- + Be organized
- + Maintain open and cooperative working relationship with II team
- + Schedule the appropriate personnel - subject matter experts (SMEs)

# INTEGRATED INSPECTION EXPLORER PIPELINE

- ✘ Timeline of II for Explorer Pipeline – 14 months:
  - + Preparations for II:
    - ✘ January - March, 2009
  - + Inspections conducted:
    - ✘ April - June, 2009
  - + Follow-up correspondence & data:
    - ✘ June - December 2009
  - + NOA and Warning Letter:
    - ✘ January 2010
  - + Respond to NOA and Warning Letter:
    - ✘ February 2010
  - + Closure received:
    - ✘ March 2010

