



Belle Fourche Pipeline Co.
PO Drawer 2360
Casper WY 82602

April 2, 2020

Dustin Hubbard
Director Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave
Suite 110
Lakewood, CO 80228

RE: CPF -2020-5002M Notice of Amendment Tank Bottom Lining Construction

Dear Mr. Hubbard,

This letter is written in response to the Notice of Amendment (NOA) dated February 28, 2020 to Mr. H. A. True, III, President, Belle Fourche Pipeline Company (BFPC), which was written as a result of inspections conducted on January 28-30, June 3-7, July 15-19, 22-26, and September 12, 2019 of BFPC's written plans and procedures in Casper, Wyoming. The NOA alleges 1 inadequacy of BFPC's written procedures and requires BFPC to submit amended procedures within 45 days of receipt of the NOA.

To address the concern, BFPC has amended O&M Procedure 5.0 Maintenance Procedures to specifically include a reference to require that tank bottom linings be installed in accordance with API Recommended Practice 652. In our corrosion control section 5.6 and specifically under section 5.6.1 the following language has been added:

| | |
|--|---|
| <i>Breakout Tank Bottom Linings</i> | Company breakout tank bottom linings installed after October 2005 will be installed in accordance with API Recommended Practice 652, as referenced in 49 CFR 195.3. |
|--|---|

We believe this language addresses PHMSA's concern and ask that the notice of amendment be closed accordingly.

This letter is not a waiver of Belle Fourche's legal rights under the Notice of Amendment in CPF 5-2020-5002M, and is without admission of fact or law.

If you have additional questions, please contact Kevin Pena, Compliance Coordinator at 406-687-3306.



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Sincerely,

A handwritten signature in black ink, appearing to read "Ken Dockweiler".

Ken Dockweiler
Director – Land, Government, and Compliance

Attachment

CC: Tad True, Belle Fourche Pipeline
 Kevin Cook, Belle Fourche Pipeline
 Doug Thacker, Belle Fourche Pipeline
 Kevin Pena, Belle Fourche Pipeline