



U.S. Department  
of Transportation

Pipeline and Hazardous Materials  
Safety Administration

12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

March 6, 2015

Mr. Tad True  
President  
Bridger Pipeline, LLC  
PO Drawer 2360  
Casper, WY 82602

**Re: CPF No. 5-2015-5003H  
Items 2 and 3 - Approval of Restart Plan for Poplar Pipeline (MP 144.4 to 193.6)**

Dear Mr. True:

I received your “Request to Restart” letters and proposed Restart Plans, dated February 20, 2015, and resubmitted with revisions on March 3, 2015. These letters requested approval to restart the South Poplar Pipeline System from Milepost (MP) 144.4 to 193.6. This pipeline section is located between the mainline valve located on the south side of the Yellowstone River and extends to your Baker Station in Fallon County, Montana. Specifically, you requested to return this pipeline to service at a reduced pressure. Per the requirements of PHMSA’s Corrective Action Order (CAO) Item #2 and #3, I am approving the Restart Plan to allow a partial restart of your South Poplar Pipeline System between the South Block Valve @ MP 144.4 to and the Baker Station @ MP193.6.

My staff reviewed your submitted Restart Plan including management of change (MOC) forms and procedures to operate this pipeline segment at a pressure at least 20 percent less than the pressure at the time of failure. My staff also visited your Casper, Wyoming office on March 2 and 3<sup>rd</sup> to review and confirm records of right-of-way (ROW) patrols, high discharge set point pressures for the pipeline injection pumps, and in-line-inspection (ILI) reports. Furthermore, PHMSA contracted with a third party subject matter expert (SME) to integrate and review all ILI survey information to confirm the integrity of this section of pipeline to be restarted. The SME confirmed that the most recent ILI results did not reveal any integrity threats on the section between MP 144.4 and 193.6. PHMSA’s review confirms the CAO requirements in Items 2(a) through 2(f), and Items 3(a) through 3(e) have been met for this pipeline segment.

I do want to clarify the requirements of Item 2(c) of the CAO with respect to this specific segment of the "Affected Pipeline" as defined in the CAO. Item 2(c) requires that when Bridger restarts the Affected Pipeline, that they bring up the pressure incrementally and then hold each pressure for a period of two hours to ensure the integrity of the line segment during the restart process. PHMSA learned after the CAO had been issued that the segment you want to restart receives crude oil from the Gas City and 19C Inject Stations via periodic deliveries using Lease Automatic Custody Transfer (LACT) pumps. These LACT pumps operate automatically based on volume levels in nearby tankage. I understand that it would be impractical to bring up the pipeline pressure incrementally in this segment and hold it. Additionally, my staff confirmed that this pipeline segment was "shut in" after the release on January 17, and the static pressure remained constant for a period of approximately seven hours at a level very close to the proposed restart pressure. Because of these facts, Bridger may restart the Gas City and 19C Injection Stations individually, and then in tandem, for a period of two hours each while continually monitoring the ROW. I consider this proposed mode of operation to be in compliance with Item 2(c) of the CAO.

By your receipt of this letter, I approve the restart plan and resumption of limited operations for the line segment downstream of the South Yellowstone Block Valve (MP144.4) to Baker Station (MP 193.6). Please feel free to contact me at 720-963-3160 or Peter Katchmar at 303-807-8458 to discuss our comments or if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Chris Hoidal". The signature is written in a cursive, flowing style.

Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry  
PHP-500 P. Katchmar