



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Avenue SE
Washington DC 20590

APR 26 2018

Mr. Wm. Dean Gore, Jr.
Vice President, Environmental & Regulatory Compliance
Plains All American GP LLC
333 Clay Street, Suite 1600 (77002)
Houston, Texas 77210-4648

Dear Mr. Gore:

In an August 21, 2017, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you requested an interpretation of 49 CFR Part 195. Specifically, you requested an interpretation regarding the scope of the 180-day evaluation and remediation requirement in § 195.452(h)(4)(iii)(H) - Corrosion of or along a longitudinal seam weld.

You provided the following information.

... "Corrosion of or along a longitudinal seam weld" includes both ordinary corrosion crossing the seam, which generally does not pose an immediate threat to a pipeline's integrity, as well as selective seam weld corrosion ("SSWC"), which does pose an immediate a threat to a pipeline's integrity.

[A] strict application of § 195.452(h)(4)(iii)(H) does not distinguish between SSWC which requires high priority (180-day timed condition) assessment and repair, and ordinary corrosion that poses no more risk than ordinary pipe body corrosion. In addition, because § 195.452(h)(4)(iii)(H) does not distinguish between ordinary corrosion and SSWC, the criteria for scheduling the assessment and repair of ordinary corrosion based on metal loss and location (among other criteria) appear to be inapplicable. The result is that a substantial number of assessments and repairs are required simply because the anomaly is along, in or crosses over the pipe long seam even though no threat is posed to the long-term integrity of the pipeline. This, in turn, results in significant additional expenditures that could be better used to address assessment and repair of corrosion that poses more risk. ... it also results in significant inconvenience to the general public due to the destructive surface activities (transportation infrastructure damage and closures) necessary to perform the assessments and repairs.

Plains does not believe that PHMSA intended such onerous results from the application of § 195.452(h)(4)(iii)(H). The requirements under § 195.452(h) are part of a comprehensive program of pipeline integrity management and therefore contingent upon the application of sound engineering practices during an evaluation. Accordingly, Plains is requesting clarification that remediation actions are only required when they are

The Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety provides written clarifications of the Regulations (49 CFR Parts 190-199) in the form of interpretation letters. These letters reflect the agency's current application of the regulations to the specific facts presented by the person requesting the clarification. Interpretations do not create legally-enforceable rights or obligations and are provided to help the public understand how to comply with the regulations.

necessary to “ensure the condition is unlikely to pose a threat to the long-term integrity of the pipeline,” and specifically a request for interpretation that the evaluation and remediation requirement of § 195.452(h)(4)(iii)(H) applies only to SSWC...

Read together, subparagraph (h)(1) provides that an operator may evaluate a condition listed under subparagraph (h)(4) and determine that it does not require remediation. It would be illogical to interpret “evaluation and remediation” to have separate meanings in subparagraphs (h)(1) and (h)(4), wherein remediation is required in all cases under subparagraph (h)(4) but only when necessary under subparagraph (h)(1). Nor can subparagraph (h)(1) logically be read to exclude (h)(4), e.g., limit its application to the catch-all provision for condition schedules in § 195.452(h)(4)(iv).

This interpretation is further supported in the preamble to the original final rule. PHMSA indicated that all conditions identified during the integrity assessment must be evaluated. In contrast, PHMSA limited the requirement to repair/remediate to those conditions determined during the evaluation process to have the potential to affect the pipeline’s integrity:

The rule still requires an operator to take prompt action to address all pipeline integrity issues raised by the integrity assessment and information integration. The rule now clarifies that an operator is required to evaluate all anomalies and repair those that could affect the pipeline’s integrity.

Pipeline Safety: Pipeline Integrity Management in High Consequence Areas (Hazardous Liquid Operators With 500 or More Miles of Pipeline), 65 Fed. Reg. 75,377, 75,383 (Dec. 1, 2000).

Plains assessed 513-517 using ILI in identifying anomalies. Pursuant to Plains’ integrity management program, these anomalies were further evaluated by [a contractor], and it was determined that the pipeline segments are not susceptible to SSWC and that remediation of the non-injurious seam weld metal loss anomalies is not necessary to protect the integrity of the pipeline.

Plains requests clarification that the requirement under 49 CFR § 195.452(h)(4)(iii)(H), that an operator must schedule remediation of corrosion of or along a longitudinal seam weld within 180 days of discovery, applies only when a condition is likely to pose a threat to the long-term integrity of a pipeline, and that such interpretation is applicable to Plains integrity management program for 513-517 and the segments referenced herein.

Interpretation

Section 195.452(h)(1) states:

(h) *What actions must an operator take to address integrity issues?*

(1) *General requirements.* An operator must take prompt action to address all anomalous conditions the operator discovers through the integrity assessment or information

analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity. An operator must be able to demonstrate that the remediation of the condition will ensure the condition is unlikely to pose a threat to the long-term integrity of the pipeline. An operator must comply with §195.422 when making a repair.

Section 195.452(h)(4)(iii)(H) states:

(h) *What actions must an operator take to address integrity issues?*

(4) *Special requirements for scheduling remediation*

(iii) *180-day conditions.* Except for conditions listed in paragraph (h)(4)(i) or (ii) of this section, an operator must schedule evaluation and remediation of the following within 180 days of discovery of the condition:

(H) Corrosion of or along a longitudinal seam weld.

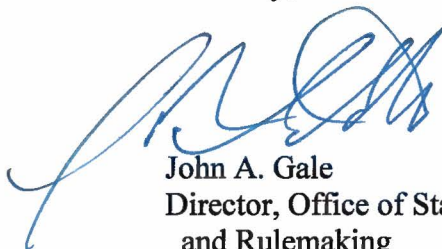
Plains is correct that § 195.452(h)(4)(iii) does not distinguish between SSWC and other types of corrosion. Though § 195.452(h)(1) provides general requirements to address integrity management issues, § 195.452(h)(4) provides requirements for remediating specific conditions. For example, corrosion along seam welds is singled out as a special requirement for scheduling remediation because of the elevated risk to safety. Section 195.452(h)(4)(iii)(H) states that an operator must schedule evaluation and remediation of corrosion of or along a longitudinal seam weld within 180 days of discovery of the corrosion. This requirement applies regardless of the type of corrosion along the weld.

While an operator must generally take prompt action to address anomalies under § 195.452(h)(1), including assessing remediation, and must address conditions not otherwise listed under § 195.452(h)(4)(iv), if an operator discovers corrosion along a longitudinal seam weld, the operator must schedule remediation within 180-days as required by § 195.452(h)(4)(iii).

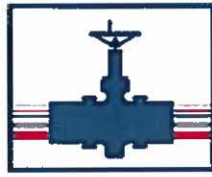
Plains must therefore schedule remediation within 180-days for any corrosion discovered along and including [across] longitudinal seam welds on 513-517 and the segments referenced in Plains' interpretation request.

If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,



John A. Gale
Director, Office of Standards
and Rulemaking



PLAINS
ALL AMERICAN
PIPELINE, L.P.

August 21, 2017

Via Certified Mail and Electronic Mail

John Gale
Director of the Office of Standards and Rulemaking
Office of Pipeline Safety (PHP-30)
PHMSA
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590-0001

**Re: Request for Interpretation of 49 C.F.R. §195.452(h)(4)(iii)(H) -
“Corrosion of or along a longitudinal seam weld”**

Dear Mr. Gale:

Pursuant to 49 C.F.R. §190.11(b), Plains All American Pipeline, L.P. (“Plains”) is requesting a written regulatory interpretation from the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) Office of Pipeline Safety regarding the scope of the 180-day evaluation and remediation requirement in §195.452(h)(4)(iii)(H) (“Corrosion of or along a longitudinal seam weld”). As described more fully below, “Corrosion of or along a longitudinal seam weld” includes both ordinary corrosion crossing the seam, which generally does not pose an immediate threat to a pipeline’s integrity, as well as selective seam weld corrosion (“SSWC”), which does pose an immediate threat to a pipeline’s integrity.

Plains submits that a strict application of §195.452(h)(4)(iii)(H) does not distinguish between SSWC which requires high priority (180-day timed condition) assessment and repair, and ordinary corrosion that poses no more risk than ordinary pipe body corrosion. In addition, because §195.452(h)(4)(iii)(H) does not distinguish between ordinary corrosion and SSWC, the criteria for scheduling the assessment and repair of ordinary corrosion based on metal loss and location (among other criteria) appear to be inapplicable. The result is that a substantial number of assessments and repairs are required simply because the anomaly is along, in or crosses over the pipe long seam even though no threat is posed to the long-term integrity of the pipeline. This, in turn, results in significant additional expenditures that could be better used to address assessment and repair of corrosion that poses more risk. In the case of the pipeline systems

discussed in this letter, it also results in significant inconvenience to the general public due to the destructive surface activities (transportation infrastructure damage and closures) necessary to perform the assessments and repairs.

Plains does not believe that PHMSA intended such onerous results from the application of §195.452(h)(4)(iii)(H). The requirements under §195.452(h) are part of a comprehensive program of pipeline integrity management and therefore contingent upon the application of sound engineering practices during an evaluation. Accordingly, Plains is requesting clarification that remediation actions are only required when they are necessary to “ensure the condition is unlikely to pose a threat to the long-term integrity of the pipeline,”¹ and specifically a request for interpretation that the evaluation and remediation requirement of §195.452(h)(4)(iii)(H) applies only to SSWC.

I. Background

In 2016, Plains assessed four hazardous material pipeline segments in California using In-Line Inspection (ILI) with deformation, ultrasonic wall thickness, and high resolution circumferential magnetic flux leakage tool technologies. These line segments have no history of release or test failure, and have adequate cathodic protection.

On one of the segments, 513-517, located in Long Beach, Plains identified 2,377 anomalies meeting the criteria for investigation based on ILI data. Pursuant to Plains’ pipeline integrity management program, these anomalies were further evaluated to determine if the anomalies are susceptible to SSWC. Plains retained the services of Kiefner and Associates, Inc. (“Kiefner”) to conduct additional investigation and evaluation of the anomalies and their effect on the pipeline integrity of 513-517. Based on Kiefner’s evaluation, 1,377 anomalies were classified as non-pressure failing seam weld metal loss (non-pressure failing—*i.e.*, PSafe and PBurst calculations exceeded maximum operating pressure). Further analysis (field metallography, linear polarization resistance and ultrasonic contact impedance) of a subset of these anomalies, and determined that the seam weld metal loss anomalies did not exhibit the characteristics of SSWC and that therefore the 513-517 segment is not susceptible to SSWC.²

However, under a strict interpretation of “Corrosion of or along a longitudinal seam weld” in §195.452(h)(4)(iii)(H), Plains would be required to remediate these anomalies within 180 days of discovery. Remediating this ordinary corrosion on 513-517 would result not only in the expenditure of resources that could be better used to address assessment and repair of corrosion that poses more immediate risk, but would also cause significant inconvenience to the public in the tearing up of roads, sidewalks, and other surface areas in densely populated areas as the pipelines are removed and repaired.

¹ 49 C.F.R. § 195.452(h)(1).

² The remaining 1000 anomalies were remediated by Plains.

To address the ordinary corrosion discovered during the ILI assessment on 513-517, Plains intends to modify the integrity management program for 513-517 to (1) reduce the interval between periodic assessments using ILI from every five years to every three years, and (2) conduct additional hydrostatic testing. Contingent on the receipt of similar information ruling out SSWC, concurrent with validation of ILI tool performance, Plains would like to follow a similar program on the remaining segments.³ Plains consulted with representatives of the California Office of the State Fire Marshall (the "OSFM") on these proposed modifications to the integrity management program, and the representatives agreed that the proposed modifications adequately protect the integrity of the pipeline. However, the OSFM representatives suggested that Plains submit a written request for interpretation to PHMSA regarding §195.452(h)(4)(iii)(H) requesting confirmation that conditions identified during an ILI periodic assessment which are evaluated to be ordinary corrosion crossing the longitudinal seam and which do not reduce a pipeline's integrity are not required to be remediated by the operator within 180 days.

II. 49 C.F.R. §195.452 – Pipeline Integrity Management Program

49 C.F.R. §195.452 provides for a comprehensive integrity management program for hazardous liquid pipeline segments that, in the event of a leak or failure, could affect populated areas, areas unusually sensitive to environmental damage and commercially navigable waterways. Elements of an integrity management program are identified in §195.452(f) and include, *inter alia*, a baseline assessment plan, a continual process of assessment and evaluation, and post-assessment remedial actions.

The requirements for a continual process of assessment and evaluation are delineated in §195.452(j). Section 195.452(j)(5) specifies the permissible methods for assessing the integrity of the line pipe during the periodic assessment. One of the permissible assessment methods is use of ILI tool or tools "capable of detecting corrosion and deformation anomalies, including dents, gouges, and grooves."⁴ Use of an ILI tool must conform to the requirements of §195.591.⁵ Additional permitted methods include a pressure test conducted in accordance with Part 195 Subpart E or an external corrosion direct assessment in accordance with §195.88.⁶

After assessment, any anomalous conditions must be evaluated and, if necessary, remediated. §195.452(h) is identified by the integrity management program regulations as both

³ The four segments assessed by Plains are as follows: 513-517; 508; 518, 519, 521, 522; and 528, 529. Plains has conducted all necessary remediations to 508. Plains integrity management program as to the remaining segments is contingent upon PHMSA's response to the request for interpretation of §195.452(h)(4)(iii)(H).

⁴ 49 C.F.R. § 195.452(j)(5)(i).

⁵ Specifically, "[w]hen conducting in-line inspection of pipelines required by this part, each operator must comply with the requirements and recommendations of API Std 1163, Inline Inspection Systems Qualification Standard; ANSI/ASNT ILI-PQ, Inline Inspection Personnel Qualification and Certification; and NACE SP0102-2010, Inline Inspection of Pipelines (incorporated by reference, see §195.3). An in-line inspection may also be conducted using tethered or remote control tools provided they generally comply with those sections of NACE SP0102-2010 that are applicable." 49 C.F.R. § 195.591.

⁶ 49 C.F.R. § 195.452(j)(5)(ii)-(iii).

an element of the integrity management program (“[c]riteria for remedial actions”)⁷ and as part of the evaluation process of a periodic assessment (“preventive and mitigative actions”).⁸ Subparagraph (h)(1) defines the contours of this process, and makes clear that addressing a condition under paragraph (h) requires evaluation of the condition **but does not require remediation in all circumstances, only those that could reduce a pipeline’s integrity.**⁹ The subsequent provisions in paragraph (h) set up a hierarchy to prioritize the repair schedule for certain conditions. Specifically, conditions are grouped as follows under §195.452(h)(4):

- Immediate repair conditions (§195.452(h)(4)(i));
- 60-day conditions (§195.452(h)(4)(ii));
- 180-day conditions (§195.452(h)(4)(iii)); and
- Other conditions (§195.452(h)(4)(iv)).¹⁰

Corrosion of or along a longitudinal seam weld is listed as a 180-day condition under §195.452(h)(4)(iv)(H) and is of concern because of the risk of SSWC is primarily in pipe manufactured prior to 1970 using low-frequency electric resistance welding or electric flash welding.¹¹ However, corrosion of or along a longitudinal seam weld is not necessarily indicative of, or a precursor to, SSWC. Rather, additional analysis and evaluation beyond the results of an ILI are necessary to determine whether corrosion of or along a longitudinal seam requires remediation.

III. Selective Seam Weld Corrosion

As discussed under Section II, above, 49 C.F.R. §195.452 creates a comprehensive program for pipeline integrity management. Each provision of this section must be read as part of a larger whole and interpreted in the context of the surrounding provisions.¹² This contextual

⁷ 49 C.F.R. § 195.452(f)(4) (“Criteria for remedial actions to address integrity issues raised by the assessment methods and information analysis (see paragraph (h) of this section)”).

⁸ 49 C.F.R. § 195.452(j)(2) (“The evaluation must consider the results of the baseline and periodic integrity assessments, information analysis (paragraph (g) of this section), and decisions about remediation, *and preventive and mitigative actions* (paragraphs (h) and (i) of this section).”) (emphasis added).

⁹ 49 C.F.R. § 195.452(h)(1).

¹⁰ 49 C.F.R. § 195.452(h)(4).

¹¹ PHMSA, “Fact Sheet: Selective Seam Corrosion” (Dec. 1, 2011), *available at*: <https://primis.phmsa.dot.gov/comm/FactSheets/FSSelectiveSeamCorrosion.htm>.

¹² *Cf. National Resources Defense Council v. U.S. E.P.A.*, 437 F.Supp.2d 1137 (C.D. Cal. 2006) (“[W]ell-accepted rules of statutory construction instruct that provisions should be read in relation to one another and in the context of the entire statute in which they appear, with a sense of their place within the overall statutory structure. *See Davis v. Mich. Dept. of Treasury*, 489 U.S. 803, 809 (1989). When possible, courts should interpret a statute as a coherent regulatory scheme.”).

interpretation is particularly true for subparagraph (h)(4), addressing evaluation and remediation of anomalies.

Section 195.452(h)(4)(iii), identifies two actions, evaluation and remediation, for the operator that are subject to a 180-day schedule:

Except for conditions listed in paragraph (h)(4)(i) or (ii) of this section, an operator must schedule evaluation and remediation of the following within 180 days of discovery of the condition:

...
*(H) Corrosion of or along a longitudinal seam weld.*¹³

The scope of “evaluation and remediation” in §195.452(h)(4)(iii) is clarified by the other provisions in paragraph (h). To do otherwise would fail to give meaning and purpose to every provision of paragraph (h).¹⁴ Subparagraph (h)(1) is titled “General requirements” and should be interpreted as generally applicable to all provisions within paragraph (h).¹⁵ The plain language of §195.452(h)(1) states that evaluation must occur for all anomalous conditions identified using one of the permissible methods for assessing the integrity of the line pipe¹⁶ but remediation is only necessary for the subset of conditions that could reduce the pipeline’s integrity:

*General requirements. An operator must take prompt action to address all anomalous conditions the operator discovers through the integrity assessment or information analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity. An operator must be able to demonstrate that the remediation of the condition will ensure the condition is unlikely to pose a threat to the long-term integrity of the pipeline. An operator must comply with §195.422 when making a repair...*¹⁷

Read together, subparagraph (h)(1) provides that an operator may evaluate a condition listed under subparagraph (h)(4) and determine that it does not require remediation. It would be illogical to interpret “evaluation and remediation” to have separate meanings in subparagraphs (h)(1) and (h)(4), wherein remediation is required in all cases under subparagraph (h)(4) but only when necessary under subparagraph (h)(1). Nor can subparagraph (h)(1) logically be read to

¹³ 49 C.F.R. §195.452(h)(4)(iii).

¹⁴ See, e.g., *Shipbuilders Council of Am., Inc. v. United States Coast Guard*, 578 F.3d 234, 244 (4th Cir. 2009) (“In interpreting statutes and regulations, we have a duty, where possible, to give effect to all operative portions of the enacted language, including its every clause and word.”) (internal citations omitted).

¹⁵ Cf. *Florida Dept. of Rev. v. Piccadilly*, 128 S. Ct. 2326, 2336 (2008) (“To be sure, a subchapter heading cannot substitute for the operative text of the statute. Nonetheless, statutory titles and section headings ‘are tools available for the resolution of a doubt about the meaning of a statute.’”) (internal citations omitted).

¹⁶ 49 C.F.R. § 195.452(j)(5).

¹⁷ 49 C.F.R. § 195.452(h)(1).

exclude (h)(4), e.g., limit its application to the catch-all provision for condition schedules in §195.452(h)(4)(iv). When the rule was first promulgated, the “other conditions” provision in paragraph (h) comprised a list of additional conditions rather than being a catch-all provision, and mirrored the “evaluation and repair” language in (h)(4)(i) through (iv):

- (iv) Other conditions. An operator must schedule evaluation and repair of the following conditions:*
- (A) Data that reflect a change since last assessed.*
 - (B) Data that indicate mechanical damage that is located on the top half of the pipe.*
 - (C) Data that indicate anomalies abrupt in nature.*
 - (D) Data that indicate anomalies longitudinal in orientation.*
 - (E) Data that indicate anomalies over a large area.*
 - (F) Anomalies located in or near casings, crossings of another pipeline, and areas with suspect cathodic protection.¹⁸*

Subparagraph (h)(2) provides further clarity that the evaluation step must be a substantive process, by granting up to 180 days after the integrity assessment to determine whether the condition presents a potential threat. Discovery, as defined by the regulations, is not merely a binary analysis of whether or not a condition exists:

- (2) Discovery of condition. Discovery of a condition occurs when an operator has adequate information about the condition to **determine that the condition presents a potential threat to the integrity of the pipeline.** An operator must promptly, but no later than 180 days after an integrity assessment, obtain sufficient information about a condition to make that determination, unless the operator can demonstrate that the 180-day period is impracticable.¹⁹*

This interpretation is further supported in the preamble to the original final rule. PHMSA indicated that all conditions identified during the integrity assessment must be evaluated. In contrast, PHMSA limited the requirement to repair/remediate to those conditions determined during the evaluation process to have the potential to affect the pipeline’s integrity:

- The rule still requires an operator to take prompt action to address all pipeline integrity issues raised by the integrity assessment and information integration. The rule now clarifies that an operator is required to **evaluate all anomalies and repair those that could affect the pipeline's integrity.**²⁰*

¹⁸ Pipeline Safety: Pipeline Integrity Management in High Consequence Areas (Hazardous Liquid Operators With 500 or More Miles of Pipeline), 65 Fed. Reg. 75,377, 75,408 (Dec. 1, 2000).

¹⁹ 49 C.F.R. § 195.452(h)(2) (emphasis added).

²⁰ Pipeline Safety: Pipeline Integrity Management in High Consequence Areas (Hazardous Liquid Operators With 500 or More Miles of Pipeline), 65 Fed. Reg. 75,377, 75,383 (Dec. 1, 2000).

A substantive evaluation of corrosion of or along a longitudinal seam weld detected during an ILI assessment can determine whether the detected condition(s) presents a potential threat to the integrity of the pipeline. This evaluation may include additional testing. As discussed above, Plains contracted with Kiefner to assist in evaluating whether segments 513-517 are susceptible to SSWC. Kiefner reviewed ILI data and subsequently identified 18 dig locations that had the greatest possibility of finding SSWC. At six of these locations, Kiefner performed field metallography, linear polarization resistance (LPR) and Ultrasonic Contact Impedance (UCI) hardness nondestructive testing. Specifically:

- Seam microstructure imagery was used to evaluate the Charpy V-notch (CVN) transition temperature. If the imagery confirmed the CVN transition temperature is less than 200 °F, then ordinary corrosion can be treated as blunt metal loss for RSTRENG (Remaining Strength) or KAPA pressure evaluations.
- LPR testing evaluated the corrosion rates of the seam and the pipe body. Higher readings would require a shortened reassessment interval of three years, even if no SSWC was found.
- Macroetch imagery and hardness measurements were used to identify post-weld heat treatments and distinguish high frequency from low frequency seams.

Based on this evaluation, Kiefner found no evidence of SSWC, i.e., conditions that presented a potential threat to the integrity of the pipeline. Only two locations had corrosion crossing the long seam and the other four locations had linear indications that were not caused by SSWC and were believed to be lack of fusion features. The results of the LPR testing determined that the pipe seam and the pipe body corrode at similar rates and SSWC is not a threat to 513-517. The metallography evaluations determined that the CVN transition temperature is less than 200° F, such that ordinary corrosion crossing the seam can be treated as blunt metal loss.

Consequently, the Kiefner evaluation confirmed that substantive analysis post-assessment is appropriate and can eliminate unnecessary costs and reduce inconvenience to the public that would result from an interpretation that all conditions listed in §195.452(h)(4) must be remediated without evaluation

IV. Request for Interpretation

Plains assessed 513-517 using ILI in identifying anomalies. Pursuant to Plains' integrity management program, these anomalies were further evaluated by Kiefner, and it was determined that the pipeline segments are not susceptible to SSWC and that remediation of the non-injurious seam weld metal loss anomalies is not necessary to protect the integrity of the pipeline.

Plains' integrity management program meets the comprehensive program for pipeline integrity management contemplated in 49 C.F.R. §195.452. A strict interpretation of "corrosion of or along a longitudinal seam weld" under §195.452(h)(4)(iii)(H), which would encompass *any* ordinary corrosion along a weld seam, undermines the effectiveness of the integrity management program and would lead to the unnecessary excavation and remediation of pipelines. The result

Mr. John Gale
August 21, 2017
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would be significant inconvenience to the general public caused by surface damages resulting from the needless removal and repairs of pipelines and an inefficient use of resources that could be better used to repair corrosion that poses immediate risk. Accordingly, Plains requests clarification that the requirement under 49 CFR § 195.452(h)(4)(iii)(H), that an operator must schedule remediation of corrosion of or along a longitudinal seam weld within 180 days of discovery, applies only when a condition is likely to pose a threat to the long-term integrity of a pipeline, and that such interpretation is applicable to Plains integrity management program for 513-517 and the segments referenced herein.

Your assistance in clarifying PHMSA's interpretation of the pipeline integrity management provisions will be very much appreciated. Please do not hesitate to contact me at (713) 646-4419 if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Wm. Dean Gore, Jr.', with a long horizontal line extending to the right.

Wm. Dean Gore, Jr.
Vice President, Environmental and Regulatory Compliance
Plains All American GP LLC, the General Partner of Plains AAP, L.P.,
The Sole Member of PAA GP LLC, the General Partner of
Plains All American Pipeline, L.P.

cc: Kim West, PHMSA Western Region
Dustin Hubbard, PHMSA Western Region
Dave Mulligan, PHMSA Western Region
Ben Ho, California Office of the State Fire Marshall
Christopher Fox, California Office of the State Fire Marshall
Doug Allen, California Office of the State Fire Marshall