



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

OCT 26 2007

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Ms. Karen L. Kennedy  
Operations and Engineering Manager  
ConocoPhillips Alaska Pipelines  
P.O. Box 100360  
Anchorage, AK 99510-0360

**Docket No. PHMSA-2006-26529**

Dear Ms. Kennedy:

On June 20, 2006 you wrote to the Pipeline and Hazardous Materials Safety Administration (PHMSA) requesting a waiver of compliance from PHMSA's pipeline safety regulation 49 CFR 195.424 while performing maintenance on above ground hazardous liquid pipelines that ConocoPhillips Alaska Pipelines (CPA) operates on the North Slope of Alaska. The regulation prohibits the movement of line pipe unless the pressure in the line pipe is reduced.

The PHMSA is granting this waiver through a special permit, which is enclosed with this letter. This special permit will allow CPA to move the affected pipelines within prescribed limits during maintenance activities without reducing pressure, as required in the existing Federal pipeline safety regulations. This special permit provides some relief from the Federal pipeline safety regulations for CPA while ensuring that pipeline safety is not compromised.

My staff would be pleased to discuss this special permit or any other regulatory matter with you. Florence Hamn, Director of Regulations (202-366-4595), would be pleased to assist you.

Sincerely,

Jeffrey D. Wiese  
Associate Administrator  
for Pipeline Safety

Enclosure (Special Permit)

**U.S. DEPARTMENT OF TRANSPORTATION**  
**PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION**  
**SPECIAL PERMIT**

Docket Number: PHMSA-2006-26529  
Pipeline Operator: ConocoPhillips Alaska Pipelines  
Date Requested: June 20, 2006  
Code Section(s): 49 CFR 195.424

**Grant of Special Permit:**

The Pipeline and Hazardous Materials Safety Administration (PHMSA) grants this special permit to ConocoPhillips Alaska Pipelines (CPA) to allow CPA to move aboveground line pipe without reducing the internal pressure of the pipeline section on pipelines it operates on the North Slope of Alaska. The Federal pipeline safety regulations in 49 CFR 195.424 require internal pipeline pressure to be reduced before any line pipe is moved. This special permit, which is subject to the conditions set forth below, pertains to the approximately 100 miles of Department of Transportation regulated aboveground pipelines that CPA operates on the North Slope of Alaska.

The PHMSA grants this special permit based on the findings set forth in the “*Special Permit Analysis and Findings*” document, which can be read in its entirety in Docket PHMSA-2006-26529 in the Federal Docket Management System (FDMS) located on the internet at <http://www.regulations.gov>.

**Conditions:**

The grant of this special permit is subject to the following conditions:

- 1) This special permit only applies to routine maintenance during which the aboveground pipeline is moved laterally, longitudinally or vertically to facilitate inspections, relieve pipe stresses or restore the pipe to its intended position. This special permit does not apply to movements of the pipe to perform repairs of the pipeline or pipeline components.

- 2) Routine maintenance-related pipe movements shall not increase the stresses on the aboveground pipeline or move the aboveground pipeline to an unintended position.
- 3) This special permit does not apply during instances where the pipe has fallen off the pipe supports due to seismic events, hydraulic events, frost jacking, dilapidated support structures or any other cause.
- 4) Prior to moving any aboveground pipeline, CPA shall determine the extent to which the pipe may be safely moved, the specific procedures required for the safe movement of the pipe, the emergency procedures to be followed to shut down the pipeline in the event of an incident and the actions to be taken to protect the public, property and the environment.
- 5) CPA's, *In-Service Pipeline Lifting Guideline*, shall be incorporated into the CPA-written operations and maintenance (O&M) procedures manual required by 49 CFR 195.402.
- 6) Pipe movement shall be a "covered task" and shall be included in CPA's written Operator Qualification (OQ) program in accordance with 49 CFR 195, Subpart G - Qualification of Pipeline Personnel.
- 7) Pipe movement shall be accomplished only by personnel "OQ qualified" under CPA's written OQ program in accordance with 49 CFR 195, Subpart G - Qualification of Pipeline Personnel.
- 8) CPA shall keep detailed records of each pipe movement including, at a minimum, the designation and specific location of the pipeline moved, date and local time, personnel involved, method used to move the pipeline, condition of the pipe and coating prior to and after movement, internal pressure entering and leaving the pipeline segment before and after the pipe is moved, and the reason for the pipe movement. CPA shall keep these records for the life of the pipeline.

**Limitations:**

The PHMSA has the sole authority to make all determinations on whether CPA has complied with the specified conditions. Should CPA fail to comply with any conditions of this special permit, or should PHMSA determine this special permit is no longer appropriate or that this

special permit is inconsistent with pipeline safety, PHMSA may revoke this special permit and require CPA to comply with the regulatory requirements in 49 CFR 195.424.

**AUTHORITY:** 49 U.S.C. 60118(c) and 49 CFR 1.53.

Issued in Washington, DC on OCT 26 2007.

A handwritten signature in black ink, appearing to read "J. Wiese". The signature is written in a cursive style with a large initial "J" and "W".

Jeffrey D. Wiese,

Associate Administrator for Pipeline Safety