



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

June 19, 2015

The Honorable Lois Capps
United States House of Representatives
Washington, DC 20515

Dear Congresswoman Capps:

Thank you for your letters dated May 28 and June 11, 2015, regarding the recent Plains Pipeline, LP Line 901 pipeline failure in Santa Barbara County, California, that occurred on May 19, 2015. I appreciate your strong support for PHMSA's efforts to determine the cause of this pipeline failure and for your recent invitation to meet with our inspectors and tour the failure site to gain insight into our ongoing investigation.

While PHMSA's investigation of the Plains pipeline failure continues, we have taken swift action to prevent any further damage as a result of this incident. Specifically, PHMSA issued a Corrective Action Order (CAO) to Plains that orders it to take additional safety measures to protect the public, property and the environment from potential hazards associated with the failure. Under PHMSA's authority, Line 901 remains shut down. On June 3, PHMSA amended the CAO to require Plains to take preventive measures on Line 903, the 127-mile, 30-inch diameter pipeline connected to Line 901, to help us better understand the condition and operation of Line 903. CAOs are important enforcement tools that enable PHMSA to respond quickly to conditions that pose a hazard to the public or the environment. In this case, the CAO requires the operator to determine the root cause of the failure, take additional actions to determine the condition of the pipelines, and mitigate all factors that contributed to the crude oil release.

In your May 28, 2015, letter, you raised several questions about the timeline of events on May 19. The preliminary timeline was presented in our original CAO, and we are evaluating the promptness and adequacy of the operator's reporting of the spill as part of our ongoing investigation. As part of the ongoing investigation, PHMSA collected information from on scene responders and operator personnel. PHMSA also sent an inspector to the Plains control room in Midland, Texas. The inspector interviewed the control room operators on duty at the time of the incident, and their supervisors, and reviewed pertinent logs and information, including relevant data from the Supervisory Control and Data Acquisition (SCADA) system. Preliminary information indicates Plains implemented its emergency response procedures, as required by the pipeline safety standards, which require actions to control the flow of liquid at a release site. Plains also deployed its Oil Spill Response Organization. PHMSA's investigation

will evaluate the specific actions taken at the site and elsewhere to prevent the oil from reaching the ocean or other sensitive areas. The investigation will also evaluate the adequacy of Plains' oil spill response plan and whether the operator followed the plan.

In your May 28 letter, you also asked about spill detection sensors, emergency shutoff systems and shutoff valves on Line 901. There are pressure sensors and volumetric meters located on both ends of Line 901 that can be observed by Plains Control Center in Midland, Texas. Shutoff valves also are located at both ends of Line 901, approximately 10.7 miles apart. There are two additional shutoff valves located on either side of Refugio Creek, and one where the Venoco pipeline ties into Line 901. PHMSA regulations require pipeline operators to evaluate the need for emergency flow restriction devices (EFRD) in high consequence areas and install them where appropriate.

In your June 11 letter, you requested information about in-line inspections (ILI) of Lines 901 and 903. Our Corrective Action Order requires an expedited review and analysis of the in-line inspection (ILI) data, and the evaluation of any repair of any pipe anomalies identified as a threat to the pipeline's integrity. A third-party ILI expert will also conduct an independent review of the ILI data. PHMSA is reviewing the operator ILI summary reports as part of the investigation via a secure electronic site, and PHMSA does not possess or control the ILI data. The results of PHMSA's review of the ILI data will be included in PHMSA's investigation report and will be made available to the public once complete.

I want to assure you that safety is our top priority and PHMSA is dedicated to the protection of people, property and the environment from pipeline releases. We are committed to using all of the tools at our disposal towards our shared goal of zero pipeline spills or releases. I and any member of PHMSA's leadership team would be happy to sit down with you or your staff to discuss any further questions you might have related to the pipeline failure. If you have any questions or require additional information, please do not hesitate to contact me or Patricia Klinger, Deputy Director, Office of Governmental, International and Public Affairs, at (202) 366-4831 or by email at patricia.klinger@dot.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Stacy A. Cummings". The signature is fluid and cursive, with a long horizontal stroke at the end.

Stacy Cummings
Interim Executive Director