

January 11, 1999

Mr. Kyle Mullins  
Manager, Environmental, Health and Safety  
ST Services  
17304 Preston Road, Suite 1000  
Dallas, Texas 75252

Dear Mr. Mullins:

**CPF No. 48520M**

I was pleased to note in your letter of December 21, 1998 that you have begun a major revision of your procedural manual for pipeline operations, maintenance and emergencies. One of the benefits the pipeline operator receives from the periodic safety inspections performed by Office of Pipeline Safety (OPS) engineers is the opportunity for your supervisory personnel to sit down with the OPS inspecting engineer and discuss in detail the operators overall pipeline safety program.

Although the Notice of Amendment (CPF #48502M) did not require you to completely revise your manual, the discussions between the OPS inspecting engineer and ST Services' Western Area Manager, Jim Wilson and Alamogordo Terminal Manager, Leland Bain undoubtedly provided the impetus for ST Services' in-house audit of the manual and comparison with actual field practices and the subsequent decision to completely revise the manual.

I am granting you an extension of the due date for revising your manual as you requested.

Sincerely,

R. M. Seeley, Director  
Southwest Region