



File OF-Fac-Oil-D128-2011-01 01

25 September 2013

Mr. Adam Shelley
Project Manager / Director, Regulatory Affairs
Plains Midstream Canada ULC
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Calgary, AB T2P 0A7
Facsimile 403-233-0399

Dear Mr. Shelley:

**Plains Midstream Canada ULC (Plains) Windsor Sarnia Pipeline Reactivation
Request for Relief from Condition 6 of Order MO-011-2012 (Order) – Proposal to
run Axial Flaw Detection (AFD) In-Line Inspection (ILI) tool in lieu of crack tool**

The National Energy Board (Board) has considered Plains' 30 August 2013 request for relief from Condition 6 of the above-referenced Board Order. Plains requested that it be permitted to run a Rosen AFD tool in lieu of a crack tool utilizing ultrasonic technology. Condition 6 requires Plains to:

[C]onduct an In Line Inspection Program (i.e. ILI run, excavation and validation) using high resolution mechanical finger (geometry) and phased array cracking ILI technologies and ensuring that data integration analysis and evaluation of dents in proximity to metal loss seam and girth weld are conducted.

The results of the In-Line Inspection Program are required to be filed with the Board by 30 November 2013.

The Board is not persuaded by Plains' request for relief and is of the view that the proposed AFD tool is limited in its capability of detecting and characterizing anomalies which are oriented in the longitudinal or axial direction. Therefore, the Board considers that the use of the AFD tool does not meet the intent of Condition 6 of the Order and denies Plains' request. Plains must run a crack tool as required by Condition 6 of the Order. The Board reminds Plains that, if applicable, it must formally apply to the Board for relief in timing.

Yours truly,

Sheri Young
Secretary of the Board