

# **Late-Filed Exhibit 14**

## Pipeline Inspection Clarification

Phillips66 has two different pipeline pigging programs; one for maintenance to keep the pipeline clean and a second for pipeline integrity management.

A maintenance pigging program is developed for each pipeline in accordance with written company standards. These standards are based on industry best practices and address the considerations for an effective program, including cleaning pig selection, frequency and scheduling. Each pipeline has a maintenance pigging program designed for the service of the pipeline.

The second pigging program is for pipeline integrity management and is driven by Phillips 66's Integrity Management Program (IMP). Our IMP is written to ensure compliance with all federal, state and local regulatory requirements as well as company-specific enhanced integrity programs. The plan is very robust and audited by DOT/PHMSA on a frequent basis. When a new line is built, the pipeline is hydrotested before commissioning and an In-line Inspection (ILI) tool is run within the first year for High Consequence Areas (HCAs). The results from each tool run are then analyzed as prescribed by the IMP. Anomalies that meet the criteria for evaluation will be excavated and inspected in the ditch. All other anomalies that do not meet the current evaluation criteria are subject to an engineering analysis. This analysis uses conservative growth rates to ensure low-level anomalies will not become injurious before the next assessment. Once the field evaluations and engineering analysis are complete, our Integrity Team will review the data to determine an appropriate reassessment interval. The majority of our pipelines are on a 5 year re-assessment interval due to the robustness of our comprehensive management programs. Company performance is reviewed at least annually to gauge the effectiveness of our IMP and to identify potential opportunities for improvement.