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September 27, 2010

Mr. David D. Lykken
Director, Pipeline Safety
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
Olympia, WA 98504-7250

RECEIVED

SEP 28 2010

WUTC
Pipeline Safety Division

**RE: Chevron Pipe Line Company – Ferndale Terminal
Docket PL-100248**

Dear Mr. Lykken:

Enclosed please find Chevron Pipe Line Company's (CPL) documentation responding to each area noted in the Notice of Probable Violation letter dated August 17, 2010, concerning the technical assistance inspection that occurred the week of July 13th, 2010 at our Ferndale Terminal located in Ferndale, WA.

CPL is not contesting the concerns raised by WUTC and has revised its procedures and process accordingly to address the concerns. We believe the enclosed documentation addresses each request.

If you have questions or need further information, please contact me at (713) 432-3332.

Sincerely,

Attachments
Electronic Transmittal

- cc: J. Subsits, WUTC Supervisor
- M.R. Odom
- J.M. Barnum
- K.S. Jones
- D.M. Pratt
- T.J. Martin
- D.E. Rankin
- M.S. Parker
- V.J. Evans

CPL Response

PV1- Earthquake procedures and threshold limits for line shutoff were not in CPL's procedure manual.

WAC 480-75-660 Procedural manual for operations, maintenance and emergencies

(1) Each pipeline company must prepare and follow a procedural manual that includes the following:

(b) Procedures for responding to earthquakes, including a threshold for line shutoff, and procedures for integrity monitoring prior to restart, and ...

CPL Comment: Per WAC 480-75-660, CPL has written the emergency response procedure to address a Seismic Event. CPL has enclosed a copy of the procedure (Section 3, Initial Response Actions).

PV2 - §195.428(b) requires that relief valves on pressure breakout tanks containing highly volatile liquids be tested at intervals not exceeding 5 years. The procedures addressing this requirement could not be found in CPL's O&M Manual.

§195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

CPL Comment: The procedure has been revised to include the 5 yr. interval inspection of relief valves on breakout tanks. Additionally, CPL has added this inspection to our maintenance inspection program SAP-PM. CPL has enclosed a copy of the procedure (Section 9.10, Core Liquid Pipeline Operating and Maintenance Procedural Manual).

PV3 - CPL Ferndale Storage Terminal could not demonstrate that they had sent the required information or notification to the NPMS.

49 U.S.C. 60132, Subsection (b) Submission of Data to the NPMS Under the Pipeline Safety Improvement Act of 2002 Subsection (b):

Updates --Operators are required to make update submissions every twelve months if any system modifications have occurred. If no modifications have occurred since the last complete submission (including operator contact information), send an email to npms-nt@mbakercorp.com stating that fact. Include operator contact information with all updates.

CPL Comment: CPL submitted the required information to NPMS July 15, 2010. CPL has enclosed a copy of the CPL's submittal to NPMS (Cover/Transmittal Letter to NPMS).

PV4 - Though procedures are in place to address this requirement, CPL Ferndale Storage Terminal personnel did not provide records demonstrating periodic review of work to determine the effectiveness of procedures and taking corrective action where needed.

§195.402 *Procedural manual for operations, maintenance, and emergencies.*

(a) *General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.*

(c) *Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:*

(13) *Periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.*

CPL Comment: CPL's Behavior Based Safety process enables employees to observe peers and co-workers and provide immediate feedback on both safe and at-risk behaviors. Through regular feedback, data analysis, and Action Planning, we are able to utilize this information to lower risk and improve safety. We utilize these observations to help change the behavior of the employee and at the same time improve our procedures. CPL includes these BBS Observations during the annual procedure review.

PV5 - Records were not available showing that mainline valves were inspected for proper functioning within the required time frames.

§195.420 *Valve maintenance.*

(b) *Each operator shall, at intervals not exceeding 7 1/2 months, but at least twice each calendar year, inspect each mainline valve to determine that it is functioning properly.*

CPL Comment: CPL has identified the Mainline Block Valves to be inspected at intervals not to exceed 7½ months, but at least twice each calendar year. Additionally, CPL has added this inspection activity to our maintenance inspection program SAP-PM.

PV6 - Records were not available showing that overpressure safety devices were inspected for proper functioning within the required time frames for the line pipe or the breakout tanks.

§195.428 *Overpressure safety devices and overflow protection systems.*

(a) *Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7 1/2 months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.*

(b) In the case of relief valves on pressure breakout tanks containing highly volatile liquids, each operator shall test each valve at intervals not exceeding 5 years.

CPL Comment: CPL has identified the Overpressure Safety Devices to be inspected at intervals not to exceed 7½ months, but at least twice each calendar year. Additionally, CPL has added this inspection activity to our maintenance inspection program SAP-PM.

PV7 - Section 4 of API 653 requires inspection of the tank roof, shell, bottom and foundation. There is no evidence that this has been done.

§195.432 Inspection of in-service breakout tanks.

(b) Each operator shall inspect the physical integrity of in-service atmospheric and low-pressure steel aboveground breakout tanks according to section 4 of API Standard 653. However, if structural conditions prevent access to the tank bottom, the bottom integrity may be assessed according to a plan included in the operations and maintenance manual under §195.402(c)(3).

CPL Comment: CPL has developed a monthly inspection checklist for breakout tanks T-1 & T-2 with emphasis from API 653. PIHMSA 49CFR195 regulations do not address breakout tanks built to API 620. Currently, there is no API Standard that is specifically written for API 620 tank inspection. Furthermore, API 653 can have some applicable guidelines to use and even refers to API-620 for certain checks but API-653 is written to specifically apply to API 650 tanks. CPL has added the monthly inspections to our maintenance inspection program SAP-PM.

PV8 - No records were available indicating that cathodic protection tests (e.g. Pipe-to-soil readings) had been performed within the specified time period.

§195.589 What corrosion control information do I have to maintain?

(c) You must maintain a record of each analysis, check, demonstration, examination, inspection, investigation, review, survey, and test required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that corrosion requiring control measures does not exist. You must retain these records for at least 5 years, except that records related to §§195.569, 195.573(a) and (b), and 195.579(b)(3) and (c) must be retained for as long as the pipeline remains in service.

§195.573 What must I do to monitor external corrosion control?

(a) Protected pipelines. You must do the following to determine whether cathodic protection required by this subpart complies with §195.571:

(1) Conduct tests on the protected pipeline at least once each calendar year, but with intervals not exceeding 15 months. However, if tests at those intervals are impractical for separately protected short sections of bare or ineffectively coated pipelines, testing may be done at least once every 3 calendar years, but with intervals not exceeding 39 months.

CPL Comment: CPL Corrosion Engineer is working with the Ferndale Terminal team with developing a cathodic protection program. Once the program is in place all required inspections will be entered into CPL's maintenance program SAP-PM.

PV9 - Records were not produced to show that the rectifier was checked at the required inspection frequency.

§195.589 *What corrosion control information do I have to maintain?*

(c) *You must maintain a record of each analysis, check, demonstration, examination, inspection, investigation, review, survey, and test required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that corrosion requiring control measures does not exist. You must retain these records for at least 5 years, except that records related to §§195.569, 195.573(a) and (b), and 195.579(b)(3) and (c) must be retained for as long as the pipeline remains in service.*

§195.573 *What must I do to monitor external corrosion control?*

(c) *Rectifiers and other devices. You must electrically check for proper performance for rectifiers at least six times each calendar year, but with intervals not exceeding 2 1/2 months.*

CPL Comment: CPL Corrosion Engineer is working with the Ferndale Terminal team with developing a cathodic protection program. Once the program is in place all required inspections will be entered into CPL's maintenance program SAP-PM.

PV10 - No records were provided demonstrating that the casing had been tested for electrical isolation.

§195.589 *What corrosion control information do I have to maintain?*

(c) *You must maintain a record of each analysis, check, demonstration, examination, inspection, investigation, review, survey, and test required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that corrosion requiring control measures does not exist. You must retain these records for at least 5 years, except that records related to §§195.569, 195.573(a) and (b), and 195.579(b)(3) and (c) must be retained for as long as the pipeline remains in service.*

§195.575 *Which facilities must I electrically isolate and what inspections, tests, and safeguards are required?*

(c) *You must inspect and electrically test each electrical isolation to assure the isolation is adequate.*

CPL Comment: CPL Corrosion Engineer is currently working with the Ferndale Terminal team with developing a cathodic protection program. Once the program is in place all required inspections will be entered into CPL's maintenance program SAP-PM.

PV11 - CPL needs to determine whether the Ferndale Storage Terminal could impact an HCA. This information would aid in determining whether the terminal needs to be included in CPL's integrity management program.

§195.452 *Pipeline integrity management in high consequence areas*

(a) *Which pipelines are covered by this section? This section applies to each hazardous liquid pipeline and carbon dioxide pipeline that could affect a high consequence area, including any pipeline located in a high consequence area unless the operator effectively demonstrates by risk assessment that the pipeline could not affect the area.*

CPL Comment: The short pipeline (317 ft.) operated by CPL at the Ferndale Storage Terminal is 100% HCA "could affect" as it directly intersects the ECO HCA. The segment is included in CPL's Pipeline Integrity Management Program. The baseline assessment will be completed within five years from the date the newly identified area was determined per §195.452(c)(3)(ii).



**SECTION 3
INITIAL RESPONSE ACTIONS**

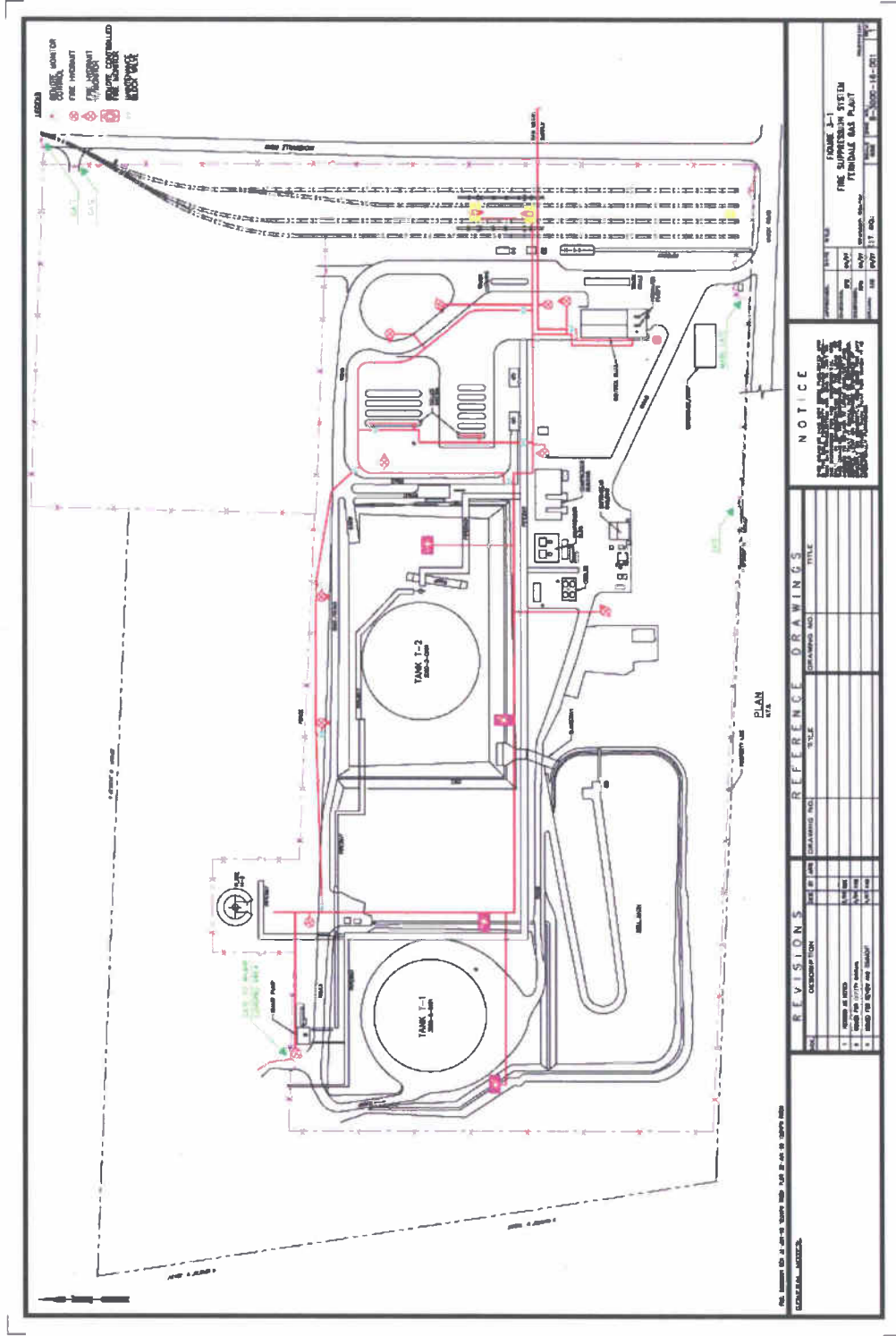


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INITIAL RESPONSE ACTIONS

Figure 3-1 - Ferndale Terminal Fire/Safety Plot Plan



INITIAL RESPONSE ACTIONS

Determine the nature and extent of the Emergency event. Use the following guidelines to ensure the safety of onsite personnel, adjacent facilities, and the public. Prepare to establish an integrated Incident Command System as defined in the U. S. Coast Guard Incident Management Handbook.

- Safety – Evacuate area if necessary and remember your safety first, foremost and always, then the safety of others.
- Isolate and Deny Entry – Establish a hot zone.
- Notifications – Make internal and external notifications per ERP.
- Command Management – Establish Incident Command System.
- Identification and Assessment – Start preparation of Site Safety Plan as soon as possible.
- Action Planning – Utilize and complete ICS Form 201.

SEISMIC EVENT (EARTHQUAKE)

When an Earthquake is observed, or notification has been received of a magnitude 5.0 Earthquake, the following steps will be initiated:

- a) All non-essential personnel will be evacuated immediately.
 - a. At this time all pipeline movements and transfers will be shut down and notification made of the termination of all movements
 - b. Shutdown all equipment that could provide a source of ignition to any fuel source
- b) If a vapor cloud is observed coming from any source within the plant, based on the magnitude and direction, either:
 - a. Evacuate the balance of terminal personnel to a designated safe muster point, or
 - b. Attempt to isolate the source of the leak by closing immediate upstream and downstream valves.
- c) Initiate the Ferndale Emergency Response Plan and notification procedures if it is determined that the terminal must be evacuated.

If Evacuation by Essential Personnel is not eminent:

- d) A visual and sensory inspection of the entire plant will be conducted to identify leaks and loss of integrity in tanks, vessels and all above ground piping.
 - a. Hydrocarbon Detectors will be utilized to measure oxygen and flammability levels in the area before proceeding with further inspections.
 - b. If any flammable or low oxygen readings are obtained, personnel will move away from the area in a upwind and/or uphill direction. Each individual inspecting an area of the plant will document their findings and observations on a plot plan of the plant.

- e) If a loss of integrity is observed in any process piping or equipment;
 - a. The system or section will be isolated from the rest of the plant and evaluated to determine the ability to operate the rest of the terminal safely while isolated and out of service.
- f) If there is no observable loss of integrity in any portion of the plant:
 - a. One internal system/process at a time will be started and monitored continuously until all normal operating parameters are achieved and stabilized for a period of 20 minutes. During that period all piping and equipment will be observed and determined to have integrity before another system is initiated.
 - b. Once all internal systems and processes are determined to operate normally and have integrity, external systems, into and from the terminal, can be started one at a time and evaluated in the same manner to determine integrity before proceeding to the next one.
 - c. Once all systems and processes are evaluated and determined to be "Normal", non-essential personnel can be allowed back onsite.
- g) All documentation will be compiled and a review of the teams response actions will be evaluated. Any action items and lessons learned from the review will be completed within the specified time frame and the resulting documentation will be stored in the terminal office.

**EMERGENCY ESCAPE PROCEDURES AND EMERGENCY ESCAPE ROUTE
ASSIGNMENTS**

Employees shall be notified of an emergency situation by a continuous blast on the facility siren. Upon being notified or made aware of an emergency situation, employees should do the following:

Immediately evacuate the building or work area and proceed to the evacuation site/s (*).

The **Operations Supervisor** shall evaluate the emergency and determine if release minimization actions are possible (see Section IV for clarification).

Each evacuated person shall report to the individual in charge of accounting for all personnel at the evacuation site/s (*).

Each evacuated individual shall stay at the evacuation site/s (*) until given other instructions by the individual in charge.

The **evacuation route map** is attached as **Exhibit "A"**. This evacuation route map is also posted on the bulletin board(s) and a copy is kept in the evacuation kit (plastic box). Directions to evacuation sites or rally points are designated on the map.

(*) **Evacuation sites/rally points** are listed and defined in **Exhibit "B"**, attached.

The site of and/or the nature of the emergency, will be communicated to personnel by word-of-mouth, facility radio or personally making a visual survey of the terminal. **Employees** need to be aware of the potential for a physically impaired employee to be working in their area. Physical impairment may be permanent or temporary (for example, a broken leg). Such employees may require assistance in evacuating or special evacuation procedures. **Employees** who work with or near a physically impaired fellow employee should be prepared to render aid in an evacuation. This may mean simply assisting the employee with evacuation from the work area or notifying other personnel that assistance is needed. To ensure the safety of all personnel at the Ferndale Terminal, **visitors and contractors are to be informed of emergency reporting procedures and evacuation routes.** The visitor / vendor / contractor safety orientation video addresses this issue with regard to contractors. Visitors are to be informed of these procedures upon entering the main office and registering with a facility representative.

**PROCEDURES TO BE FOLLOWED BY EMPLOYEES WHO REMAIN TO OPERATE
CRITICAL PLANT OPERATIONS BEFORE THEY EVACUATE**

All personnel within the terminal should evacuate upon activation of the evacuation alarm, except for individual/s who may have critical duties in operating processes or defensively minimizing the emergency. Such duties shall only be performed when it is determined that performance of such duties will not jeopardize the safety of the remaining individual/s. The **Operations Supervisor** will determine if any action can be performed to minimize the emergency without placing individuals in a hazardous situation.

If it is possible to do so safely, the following will be performed in the event of an evacuation emergency:

- (a) All product transfers will be stopped.
- (b) The refrigeration process will be placed in an emergency-operating mode such as operating the emergency flare, if appropriate.
- (c) The firewater system should be started and water should be used as appropriate (example: cooling vessels adjacent to a fire, etc.)

**PROCEDURES TO ACCOUNT FOR ALL EMPLOYEES AFTER EVACUATION HAS
BEEN COMPLETED**

The **Team Leader, or designee**, is responsible for accounting for all office personnel evacuated during the emergency event.

The **Operations Supervisor** is responsible for accounting for all operations, maintenance and contract personnel, as well as other visitors who may be at the terminal during an emergency event.

The **sign-in sheet**, located in the control room, shall be used as the primary roster for use in accounting for all visitors and contractors. The **Operations Supervisor or designee** shall take the sign-in sheet to the appropriate rally point in the event of an evacuation.

The **Operations Supervisor** shall perform a roll-call after all personnel have been evacuated and shall advise response personnel as to the status of such roll-call, particularly noting any missing individuals.

**RESCUE AND MEDICAL DUTIES FOR THOSE EMPLOYEES WHO ARE TO
PERFORM THEM**

The **Person In Charge** shall perform the following **duties**:

- (a) Decide the proper search and rescue procedures to be implemented if any personnel are missing after the evacuation.
- (b) Assign an individual responsible for calling an ambulance to the scene as soon as the emergency is known, if the emergency involves personnel injuries.

The **Person In Charge** shall be determined as follows:

- (a) **Primary Individual In Charge – Team Leader or designee**, if he/she is onsite during the emergency.
- (b) **Secondary Individual In Charge - Operations Supervisor on duty**, if Primary Individual in Charge is not onsite during the emergency.

In the case of an emergency involving an injury, **personnel who are trained in first aid** may provide first aid to the injured on a Good Samaritan basis until the arrival of the ambulance and EMT's.

PROCEDURES FOR HANDLING OF SMALL RELEASES AND ASSISTING OUTSIDE RESPONDERS

Small or incidental releases are defined as those releases or spills which do not pose a safety or health hazard to employees and do not need to be cleaned up immediately to prevent death or serious injury to employees.

If an employee discovers a small or incidental release, measures should be taken to stop or control the release. If possible, the **employee** should block-in or isolate the release until repairs can be made. If the leak is liquid in nature, the **employee** should take the proper measures to prevent the spill from spreading, entering sewers, etc. (Refer to the facility Spill Prevention Control and Countermeasures Plan (SPCC)). If the need arises, **facility personnel** may act in an advisory position with the outside agency emergency responders in an effort to isolate the release or fire.

If an employee is in doubt as to whether or not the leak is potentially dangerous, it should be treated as an emergency and reported immediately.

Core Liquid Pipeline Operating and Maintenance Procedural Manual

connections are made, sufficient support and anchor provisions must be supplied to prevent movement of the connections even in the event the parent pipe is cut.

9.7.6. Tapping

Extreme caution should be maintained in properly aligning and operating the tapping machine.

Each tap made on a DOT Regulated Pipeline under pressure shall be performed by a crew, qualified and trained in the proper procedures for making hot taps. Appropriate Non-Destructive Testing shall be performed on the area chosen for the Hot Tap to verify the wall thickness and integrity of the pipe.

9.8. Pipe Repair Records

Company shall retain pipe repair records for the life of that pipeline segment. (This includes pipe to pipe connections.) Non-pipeline repairs (repairs to equipment other than pipe) shall be retained for at least five (5) years. These repair records shall include:

- date of the repair;
- location of the repair;
- description of the repair (including parts of the pipeline replaced); and
- Company representative responsible for overseeing the repairs.

Please refer to MIP 403, 404 and 407 for further details regarding record/documentation requirements.

9.9. Abandonment or Idling of Facilities (MIP-207)

Refer to Company procedure MIP-207 and other applicable procedures for DOT compliance. Removing, abandonment, or idling of pipelines shall be done in a manner that minimizes any present or future risk to the public or the environment. Each case shall be evaluated individually to verify that all unique local conditions have been considered and properly mitigated.

For each DOT regulated abandoned offshore hazardous liquid pipeline facility or each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway, the last operator of the facility must submit a report upon abandonment of that facility.

The preferred method of submitting data on pipeline facilities abandoned shall be in accordance of the National Pipeline Mapping System (NPMS) standards. Refer to 49 CFR 195.59 for further guidance.

9.10. Overpressure Safety Devices and Overfill Protection Systems

In each pipeline system, on a yearly basis, not to exceed 15-month intervals but at least once each calendar year, it will be the responsibility for each Field Team Leader to inspect and test each pressure limiting device, relief valve, pressure regulator, pressure alarm, pressure shutdown, other item of pressure control equipment or overfill protection systems to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

Pipelines that are transporting HVL's the inspection interval for overpressure safety devices shall not to exceed 7½ months, but at least twice each calendar year.

In the case of relief valves on pressure breakout tanks containing HVL's, these relief valves shall be tested at intervals not exceeding 5 years.

It is usually not feasible to capacity-test pressure-relief devices in place; therefore, a review of the operating parameters for the pipeline at each relief valve installation shall be performed and capacity calculations conducted annually with intervals not to exceed 15 months. Documentation of this review shall be noted on the appropriate form.

Refer to the following procedures for further guidance: the corporate ERTC Pipeline manual, section 454 and corporate ERTC Instrumentation & Control manual, sections 1252 and 1282 respectively.

9.10.1. Notification

Clearance shall be obtained from CSC, the Field Team Leader, and designated representatives of affected outside companies prior to the operation of any main line valve or pressure device that affects the flow or pressure of hazardous liquid, except during an emergency. If a group of valves or pressure controlled devices are to be operated during the day, clearance may be obtained for the whole group of valves/devices rather than for individual valves. In requesting clearance, the nature of the inspection and the limits of the area in which the work will be performed shall be communicated until work is completed and conditions are back to normal. Any abnormal condition at any location must be reported immediately to the Field Team Leader.

9.10.2. Inspection of Overpressure Safety Devices

Overpressure safety devices shall be inspected and the condition of the valve shall be documented. The following items shall be included in the inspection of the overpressure protection devices:

- a) General operational and mechanical condition, including proper piping installation and material and corrosion control. Manufacturer's suggested maintenance shall be performed if available. If manufacturer's maintenance procedures are not available, notify Operations so that the proper procedures can be obtained. If the manufacturer is not able to provide the proper procedures, then Operations shall formulate procedures based on the best data available. Record exceptions and action taken;
- b) Proper set pressure;
- c) Adequate supply of pressure to the controller;
- d) Protection from any condition that might prevent proper operation;
- e) Lock or car seal open any block valve that would make the device inoperative (if not security fenced and locked);
- f) Signs or pipeline markers shall identify Company and the telephone number to call in an emergency; and
- g) The device shall be operated to confirm proper operation at set pressure and over the operating range.

9.10.2.1. Testing of Relief Valves

Relief valves, excluding rupture discs, shall be inspected to determine mechanical condition, proper set pressure, proper installation and protection from conditions that might prevent operation. The following procedures shall be used for testing **relief valves** in place to confirm the set pressure:

- The relief valve shall be isolated from the system by closing the block valve beneath the relief valve and venting the gas from the cavity between the two valves;
- Pressurize the cavity with a secondary pressure source (usually a nitrogen bottle) until the relief valve pops. At that point, record the pressure using a certified pressure test gauge or dead weight tester;
- If the relief pressure is different than the set pressure, repairs shall be made in accordance with manufacturers' recommendations and the relief valve re-tested; and
- After the relief valve relieves at the proper set pressure, re-pressure the cavity with system pressure, and determine that the relief valve is not leaking.

Cover/Transmittal Letter Template to Accompany all Submissions to the NPMS

Dear Operator: Please complete and deliver this form with your NPMS submission to fulfill the Cover/Transmittal Letter requirement listed in section 2.3 of the November 2009 Operator Standards. Please complete a separate copy of this form for each Operator ID you are submitting for. Send this file electronically if you choose to submit using the NPMS Submission FTP, or print and include it with your data disk if you choose to mail your submission to the National Repository.

Date: July 15, 2010

Operator ID: 2731

Operator Name: CHEVRON PIPE LINE

Contact Information:

Name: Gary Saenz

Phone: 713-432-3332

Email: GarySaenz@chevron.com

Brief description of system changes reflected in this submission (e.g. sold or abandoned pipelines):

This submission contains additional data for Chevron's **voluntary break-out tanks**.

State the Submission Type code from the options below that describes how this submission should be integrated into the NPMS:

This is an addition submission.

- ◆ **INI:** This is the initial submission to the NPMS for this Operator ID
- ◆ **ADD:** This submission should be added to the data currently in the NPMS for this Operator ID (Addition)
- ◆ **FRP:** This submission should replace all data currently in the NPMS for this Operator ID (Full Replacement)
- ◆ **PRP:** This submission should replace specific segments currently in the NPMS for this Operator ID as indicated by the assigned Pipeline IDs (Partial Replacement)
- ◆ **DEL:** This submission only indicates which segments should be removed from the data currently in the NPMS for this Operator ID (Deletion)

Please answer the following questions regarding your Operator ID and Submission:

Cover/Transmittal Letter Template to Accompany all Submissions to the NPMS

- 1) Does this specific Operator ID operate only gas, only liquid or both gas and liquid lines?

BOTH

- 2) Does this specific submission contain only gas, only liquid or both gas and liquid lines?

(NOTE: operators with both gas and liquid lines should not make separate gas and liquid submissions aligning with the separate Annual Report due dates-these operators should submit both gas and liquid data before the Gas Annual Report due date)

N/A

- 3) Does this specific submission contain any abandoned lines (Status Code=B)?

N/A

- 4) If you answered yes to the previous question, have you confirmed that the abandoned lines in this submission have not been previously submitted to the NPMS?

(NOTE: Never resubmit abandoned lines to the NPMS; even Full Replacement submissions should only include new abandoned lines. Your previously submitted abandoned lines do not show up on Check Plots, when you sign into PIMMA or when you use the Update Your Submission Online tool. Please contact NPMS staff at npms-nr@mbakercorp.com with any questions regarding previously submitted abandoned pipelines.)

Please include any additional information or concerns you would like to relate to the processing analyst here: