



*Panther Operating Company, LLC*

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March 1, 2016

Mr. R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 South Gessner, Suite 630  
Houston, Texas 77074



**Re: Request for Time Extension in Response to PHMSA Notice of Amendment  
(CPF 4-2015-5029M)**

Dear Mr. Seeley:

This letter and associated attachments are in response to the subject Notice of Amendment and subsequent granting of time extension until March 1, 2016 for submittal of amendments to Panther's Integrity Management Program for the High Island Pipeline System.

Panther has addressed those items noted by the inspector and has incorporated other changes that will make the program more easily understood and implemented by those Panther employees responsible for the Integrity Management Program for the High Island Pipeline System.

Included with this letter is a flash drive that includes the revised program and attachments.

The Operations and Maintenance Manual amendments are currently being prepared and will be submitted prior to the April 1, 2016 date.

Sincerely,

Luis M. Guzman  
Principal and General Counsel

Cc:  
Brandon Rochner  
Jeff Shipper  
Mike Reagan

# ELECTRONIC CODE OF FEDERAL REGULATIONS

**e-CFR Data is current as of January 16, 2015**

Amendment

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## 49 CFR--PART 195

View Printed Federal Register page 80 FR 188 in PDF format.

**Amendment(s) published January 5, 2015, in 80 FR 188**

EFFECTIVE DATES: March 6, 2015

62. In §195.452, revise paragraphs (h)(4)(i)(B), (h)(4)(iii)(D), and paragraph (l)(1) to read as follows:

### §195.452 Pipeline integrity management in high consequence areas.

\* \* \* \* \*

(h) \* \* \*

(4) \* \* \*

(i) \* \* \*

(B) A calculation of the remaining strength of the pipe shows a predicted burst pressure less than the established maximum operating pressure at the location of the anomaly. Suitable remaining strength calculation methods include, but are not limited to, ASME/ANSI B31G (incorporated by reference, see §195.3) and PRCI PR-3-805 (R-STRENG) (incorporated by reference, see §195.3).

\* \* \* \* \*

(iii) \* \* \*

(D) A calculation of the remaining strength of the pipe shows an operating pressure that is less than the current established maximum operating pressure at the location of the anomaly. Suitable remaining strength calculation methods include, but are not limited to, ASME/ANSI B31G and PRCI PR-3-805 (R-STRENG).

\* \* \* \* \*

(l) *What records must an operator keep to demonstrate compliance?*—(1) An operator must maintain, for the useful life of the pipeline, records that demonstrate compliance with the requirements of this subpart. At a minimum, an operator must maintain the following records for review during an inspection:

(i) A written integrity management program in accordance with paragraph (b) of this section.

(ii) Documents to support the decisions and analyses, including any modifications, justifications, deviations and determinations made, variances, and actions taken, to implement and evaluate each

element of the integrity management program listed in paragraph (f) of this section.

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## ELECTRONIC CODE OF FEDERAL REGULATIONS

### e-CFR Data is current as of January 16, 2015

Title 49 → Subtitle B → Chapter I → Subchapter D → Part 195 → Subpart F → §195.452

Title 49: Transportation  
PART 195—TRANSPORTATION OF HAZARDOUS LIQUIDS BY PIPELINE  
Subpart F—Operation and Maintenance

#### §195.452 Pipeline integrity management in high consequence areas.

[Link to an amendment published at 80 FR 188, Jan. 5, 2015.](#)

(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. (Appendix C of this part provides guidance on determining if a pipeline could affect a high consequence area.) Covered pipelines are categorized as follows:

(1) Category 1 includes pipelines existing on May 29, 2001, that were owned or operated by an operator who owned or operated a total of 500 or more miles of pipeline subject to this part.

(2) Category 2 includes pipelines existing on May 29, 2001, that were owned or operated by an operator who owned or operated less than 500 miles of pipeline subject to this part.

(3) Category 3 includes pipelines constructed or converted after May 29, 2001.

(b) *What program and practices must operators use to manage pipeline integrity?* Each operator of a pipeline covered by this section must:

(1) Develop a written integrity management program that addresses the risks on each segment of pipeline in the first column of the following table not later than the date in the second column:

Pipeline	Date
Category 1	March 31, 2002.
Category 2	February 18, 2003.
Category 3	1 year after the date the pipeline begins operation.

(2) Include in the program an identification of each pipeline or pipeline segment in the first column of the following table not later than the date in the second column:

Pipeline	Date
Category 1	December 31, 2001.
Category 2	November 18, 2002.
Category 3	Date the pipeline begins operation.

(3) Include in the program a plan to carry out baseline assessments of line pipe as required by

paragraph (c) of this section.

(4) Include in the program a framework that—

(i) Addresses each element of the integrity management program under paragraph (f) of this section, including continual integrity assessment and evaluation under paragraph (j) of this section; and

(ii) Initially indicates how decisions will be made to implement each element.

(5) Implement and follow the program.

(6) Follow recognized industry practices in carrying out this section, unless—

(i) This section specifies otherwise; or

(ii) The operator demonstrates that an alternative practice is supported by a reliable engineering evaluation and provides an equivalent level of public safety and environmental protection.

(c) *What must be in the baseline assessment plan?* (1) An operator must include each of the following elements in its written baseline assessment plan:

(i) The methods selected to assess the integrity of the line pipe. An operator must assess the integrity of the line pipe by any of the following methods. The methods an operator selects to assess low frequency electric resistance welded pipe or lap welded pipe susceptible to longitudinal seam failure must be capable of assessing seam integrity and of detecting corrosion and deformation anomalies.

(A) Internal inspection tool or tools capable of detecting corrosion and deformation anomalies including dents, gouges and grooves;

(B) Pressure test conducted in accordance with subpart E of this part;

(C) External corrosion direct assessment in accordance with §195.588; or

(D) Other technology that the operator demonstrates can provide an equivalent understanding of the condition of the line pipe. An operator choosing this option must notify the Office of Pipeline Safety (OPS) 90 days before conducting the assessment, by sending a notice to the address or facsimile number specified in paragraph (m) of this section.

(ii) A schedule for completing the integrity assessment;

(iii) An explanation of the assessment methods selected and evaluation of risk factors considered in establishing the assessment schedule.

(2) An operator must document, prior to implementing any changes to the plan, any modification to the plan, and reasons for the modification.

(d) *When must operators complete baseline assessments?* Operators must complete baseline assessments as follows:

(1) *Time periods.* Complete assessments before the following deadlines:

If the pipeline is:	Then complete baseline assessments not later than the following date according to a schedule that prioritizes assessments:	And assess at least 50 percent of the line pipe on an expedited basis, beginning with the highest risk pipe, not later than:
Category 1	March 31, 2008	September 30, 2004.
Category 2	February 17, 2009	August 16, 2005.
Category	Date the pipeline begins operation	Not applicable.

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(2) *Prior assessment.* To satisfy the requirements of paragraph (c)(1)(i) of this section for pipelines in the first column of the following table, operators may use integrity assessments conducted after the date in the second column, if the integrity assessment method complies with this section. However, if an operator uses this prior assessment as its baseline assessment, the operator must reassess the line pipe according to paragraph (j)(3) of this section. The table follows:

Pipeline	Date
Category 1	January 1, 1996.
Category 2	February 15, 1997.

(3) *Newly-identified areas.* (i) When information is available from the information analysis (see paragraph (g) of this section), or from Census Bureau maps, that the population density around a pipeline segment has changed so as to fall within the definition in §195.450 of a high population area or other populated area, the operator must incorporate the area into its baseline assessment plan as a high consequence area within one year from the date the area is identified. An operator must complete the baseline assessment of any line pipe that could affect the newly-identified high consequence area within five years from the date the area is identified.

(ii) An operator must incorporate a new unusually sensitive area into its baseline assessment plan within one year from the date the area is identified. An operator must complete the baseline assessment of any line pipe that could affect the newly-identified high consequence area within five years from the date the area is identified.

(e) *What are the risk factors for establishing an assessment schedule (for both the baseline and continual integrity assessments)?* (1) An operator must establish an integrity assessment schedule that prioritizes pipeline segments for assessment (see paragraphs (d)(1) and (j)(3) of this section). An operator must base the assessment schedule on all risk factors that reflect the risk conditions on the pipeline segment. The factors an operator must consider include, but are not limited to:

- (i) Results of the previous integrity assessment, defect type and size that the assessment method can detect, and defect growth rate;
  - (ii) Pipe size, material, manufacturing information, coating type and condition, and seam type;
  - (iii) Leak history, repair history and cathodic protection history;
  - (iv) Product transported;
  - (v) Operating stress level;
  - (vi) Existing or projected activities in the area;
  - (vii) Local environmental factors that could affect the pipeline (e.g., corrosivity of soil, subsidence, climatic);
  - (viii) geo-technical hazards; and
  - (ix) Physical support of the segment such as by a cable suspension bridge.
- (2) Appendix C of this part provides further guidance on risk factors.

(f) *What are the elements of an integrity management program?* An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program:

- (1) A process for identifying which pipeline segments could affect a high consequence area;
  - (2) A baseline assessment plan meeting the requirements of paragraph (c) of this section;
  - (3) An analysis that integrates all available information about the integrity of the entire pipeline and the consequences of a failure (see paragraph (g) of this section);
  - (4) Criteria for remedial actions to address integrity issues raised by the assessment methods and information analysis (see paragraph (h) of this section);
  - (5) A continual process of assessment and evaluation to maintain a pipeline's integrity (see paragraph (j) of this section);
  - (6) Identification of preventive and mitigative measures to protect the high consequence area (see paragraph (i) of this section);
  - (7) Methods to measure the program's effectiveness (see paragraph (k) of this section);
  - (8) A process for review of integrity assessment results and information analysis by a person qualified to evaluate the results and information (see paragraph (h)(2) of this section).
- (g) *What is an information analysis?* In periodically evaluating the integrity of each pipeline segment (paragraph (j) of this section), an operator must analyze all available information about the integrity of the entire pipeline and the consequences of a failure. This information includes:
- (1) Information critical to determining the potential for, and preventing, damage due to excavation, including current and planned damage prevention activities, and development or planned development along the pipeline segment;
  - (2) Data gathered through the integrity assessment required under this section;
  - (3) Data gathered in conjunction with other inspections, tests, surveillance and patrols required by this Part, including, corrosion control monitoring and cathodic protection surveys; and
  - (4) Information about how a failure would affect the high consequence area, such as location of the water intake.
- (h) *What actions must an operator take to address integrity issues?*—(1) *General requirements.* An operator must take prompt action to address all anomalous conditions the operator discovers through the integrity assessment or information analysis. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity. An operator must be able to demonstrate that the remediation of the condition will ensure the condition is unlikely to pose a threat to the long-term integrity of the pipeline. An operator must comply with §195.422 when making a repair.
- (i) *Temporary pressure reduction.* An operator must notify PHMSA, in accordance with paragraph (m) of this section, if the operator cannot meet the schedule for evaluation and remediation required under paragraph (h)(3) of this section and cannot provide safety through a temporary reduction in operating pressure.
- (ii) *Long-term pressure reduction.* When a pressure reduction exceeds 365 days, the operator must notify PHMSA in accordance with paragraph (m) of this section and explain the reasons for the delay. An operator must also take further remedial action to ensure the safety of the pipeline.
- (2) *Discovery of condition.* Discovery of a condition occurs when an operator has adequate information about the condition to determine that the condition presents a potential threat to the integrity of the pipeline. An operator must promptly, but no later than 180 days after an integrity assessment, obtain sufficient information about a condition to make that determination, unless the operator can demonstrate that the 180-day period is impracticable.
  - (3) *Schedule for evaluation and remediation.* An operator must complete remediation of a condition

according to a schedule prioritizing the conditions for evaluation and remediation. If an operator cannot meet the schedule for any condition, the operator must explain the reasons why it cannot meet the schedule and how the changed schedule will not jeopardize public safety or environmental protection.

(4) *Special requirements for scheduling remediation*—(i) *Immediate repair conditions*. An operator's evaluation and remediation schedule must provide for immediate repair conditions. To maintain safety, an operator must temporarily reduce operating pressure or shut down the pipeline until the operator completes the repair of these conditions. An operator must calculate the temporary reduction in operating pressure using the formula in Section 451.6.2.2 (b) of ANSI/ASME B31.4 (incorporated by reference, see §195.3). An operator must treat the following conditions as immediate repair conditions:

(A) Metal loss greater than 80% of nominal wall regardless of dimensions.

(B) A calculation of the remaining strength of the pipe shows a predicted burst pressure less than the established maximum operating pressure at the location of the anomaly. Suitable remaining strength calculation methods include, but are not limited to, ASME/ANSI B31G ("Manual for Determining the Remaining Strength of Corroded Pipelines" (1991) or AGA Pipeline Research Committee Project PR-3-805 ("A Modified Criterion for Evaluating the Remaining Strength of Corroded Pipe" (December 1989)). These documents are incorporated by reference and are available at the addresses listed in §195.3.

(C) A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) that has any indication of metal loss, cracking or a stress riser.

(D) A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) with a depth greater than 6% of the nominal pipe diameter.

(E) An anomaly that in the judgment of the person designated by the operator to evaluate the assessment results requires immediate action.

(ii) *60-day conditions*. Except for conditions listed in paragraph (h)(4)(i) of this section, an operator must schedule evaluation and remediation of the following conditions within 60 days of discovery of condition.

(A) A dent located on the top of the pipeline (above the 4 and 8 o'clock positions) with a depth greater than 3% of the pipeline diameter (greater than 0.250 inches in depth for a pipeline diameter less than Nominal Pipe Size (NPS) 12).

(B) A dent located on the bottom of the pipeline that has any indication of metal loss, cracking or a stress riser.

(iii) *180-day conditions*. Except for conditions listed in paragraph (h)(4)(i) or (ii) of this section, an operator must schedule evaluation and remediation of the following within 180 days of discovery of the condition:

(A) A dent with a depth greater than 2% of the pipeline's diameter (0.250 inches in depth for a pipeline diameter less than NPS 12) that affects pipe curvature at a girth weld or a longitudinal seam weld.

(B) A dent located on the top of the pipeline (above 4 and 8 o'clock position) with a depth greater than 2% of the pipeline's diameter (0.250 inches in depth for a pipeline diameter less than NPS 12).

(C) A dent located on the bottom of the pipeline with a depth greater than 6% of the pipeline's diameter.

(D) A calculation of the remaining strength of the pipe shows an operating pressure that is less than the current established maximum operating pressure at the location of the anomaly. Suitable remaining strength calculation methods include, but are not limited to, ASME/ANSI B31G ("Manual for Determining the Remaining Strength of Corroded Pipelines" (1991)) or AGA Pipeline Research Committee Project PR-3-805 ("A Modified Criterion for Evaluating the Remaining Strength of Corroded Pipe" (December 1989)). These documents are incorporated by reference and are available at the addresses listed in

## §195.3.

(E) An area of general corrosion with a predicted metal loss greater than 50% of nominal wall.

(F) Predicted metal loss greater than 50% of nominal wall that is located at a crossing of another pipeline, or is in an area with widespread circumferential corrosion, or is in an area that could affect a girth weld.

(G) A potential crack indication that when excavated is determined to be a crack.

(H) Corrosion of or along a longitudinal seam weld.

(I) A gouge or groove greater than 12.5% of nominal wall.

(iv) *Other conditions.* In addition to the conditions listed in paragraphs (h)(4)(i) through (iii) of this section, an operator must evaluate any condition identified by an integrity assessment or information analysis that could impair the integrity of the pipeline, and as appropriate, schedule the condition for remediation. Appendix C of this part contains guidance concerning other conditions that an operator should evaluate.

(i) *What preventive and mitigative measures must an operator take to protect the high consequence area?—(1) General requirements.* An operator must take measures to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area. These measures include conducting a risk analysis of the pipeline segment to identify additional actions to enhance public safety or environmental protection. Such actions may include, but are not limited to, implementing damage prevention best practices, better monitoring of cathodic protection where corrosion is a concern, establishing shorter inspection intervals, installing EFRDs on the pipeline segment, modifying the systems that monitor pressure and detect leaks, providing additional training to personnel on response procedures, conducting drills with local emergency responders and adopting other management controls.

(2) *Risk analysis criteria.* In identifying the need for additional preventive and mitigative measures, an operator must evaluate the likelihood of a pipeline release occurring and how a release could affect the high consequence area. This determination must consider all relevant risk factors, including, but not limited to:

(i) Terrain surrounding the pipeline segment, including drainage systems such as small streams and other smaller waterways that could act as a conduit to the high consequence area;

(ii) Elevation profile;

(iii) Characteristics of the product transported;

(iv) Amount of product that could be released;

(v) Possibility of a spillage in a farm field following the drain tile into a waterway;

(vi) Ditches along side a roadway the pipeline crosses;

(vii) Physical support of the pipeline segment such as by a cable suspension bridge;

(viii) Exposure of the pipeline to operating pressure exceeding established maximum operating pressure.

(3) *Leak detection.* An operator must have a means to detect leaks on its pipeline system. An operator must evaluate the capability of its leak detection means and modify, as necessary, to protect the high consequence area. An operator's evaluation must, at least, consider, the following factors—length and size of the pipeline, type of product carried, the pipeline's proximity to the high consequence area, the swiftness of leak detection, location of nearest response personnel, leak history, and risk assessment results.

(4) *Emergency Flow Restricting Devices (EFRD).* If an operator determines that an EFRD is

needed on a pipeline segment to protect a high consequence area in the event of a hazardous liquid pipeline release, an operator must install the EFRD. In making this determination, an operator must, at least, consider the following factors—the swiftness of leak detection and pipeline shutdown capabilities, the type of commodity carried, the rate of potential leakage, the volume that can be released, topography or pipeline profile, the potential for ignition, proximity to power sources, location of nearest response personnel, specific terrain between the pipeline segment and the high consequence area, and benefits expected by reducing the spill size.

(j) *What is a continual process of evaluation and assessment to maintain a pipeline's integrity?—(1) General.* After completing the baseline integrity assessment, an operator must continue to assess the line pipe at specified intervals and periodically evaluate the integrity of each pipeline segment that could affect a high consequence area.

(2) *Evaluation.* An operator must conduct a periodic evaluation as frequently as needed to assure pipeline integrity. An operator must base the frequency of evaluation on risk factors specific to its pipeline, including the factors specified in paragraph (e) of this section. The evaluation must consider the results of the baseline and periodic integrity assessments, information analysis (paragraph (g) of this section), and decisions about remediation, and preventive and mitigative actions (paragraphs (h) and (i) of this section).

(3) *Assessment intervals.* An operator must establish five-year intervals, not to exceed 68 months, for continually assessing the line pipe's integrity. An operator must base the assessment intervals on the risk the line pipe poses to the high consequence area to determine the priority for assessing the pipeline segments. An operator must establish the assessment intervals based on the factors specified in paragraph (e) of this section, the analysis of the results from the last integrity assessment, and the information analysis required by paragraph (g) of this section.

(4) *Variance from the 5-year intervals in limited situations—(i) Engineering basis.* An operator may be able to justify an engineering basis for a longer assessment interval on a segment of line pipe. The justification must be supported by a reliable engineering evaluation combined with the use of other technology, such as external monitoring technology, that provides an understanding of the condition of the line pipe equivalent to that which can be obtained from the assessment methods allowed in paragraph (j)(5) of this section. An operator must notify OPS 270 days before the end of the five-year (or less) interval of the justification for a longer interval, and propose an alternative interval. An operator must send the notice to the address specified in paragraph (m) of this section.

(ii) *Unavailable technology.* An operator may require a longer assessment period for a segment of line pipe (for example, because sophisticated internal inspection technology is not available). An operator must justify the reasons why it cannot comply with the required assessment period and must also demonstrate the actions it is taking to evaluate the integrity of the pipeline segment in the interim. An operator must notify OPS 180 days before the end of the five-year (or less) interval that the operator may require a longer assessment interval, and provide an estimate of when the assessment can be completed. An operator must send a notice to the address specified in paragraph (m) of this section.

(5) *Assessment methods.* An operator must assess the integrity of the line pipe by any of the following methods. The methods an operator selects to assess low frequency electric resistance welded pipe or lap welded pipe susceptible to longitudinal seam failure must be capable of assessing seam integrity and of detecting corrosion and deformation anomalies.

(i) Internal inspection tool or tools capable of detecting corrosion and deformation anomalies including dents, gouges and grooves;

(ii) Pressure test conducted in accordance with subpart E of this part;

(iii) External corrosion direct assessment in accordance with §195.588; or

(iv) Other technology that the operator demonstrates can provide an equivalent understanding of the condition of the line pipe. An operator choosing this option must notify OPS 90 days before conducting the assessment, by sending a notice to the address or facsimile number specified in paragraph (m) of this section.

(k) *What methods to measure program effectiveness must be used?* An operator's program must include methods to measure whether the program is effective in assessing and evaluating the integrity of each pipeline segment and in protecting the high consequence areas. See Appendix C of this part for guidance on methods that can be used to evaluate a program's effectiveness.

(l) *What records must be kept?* (1) An operator must maintain for review during an inspection:

(i) A written integrity management program in accordance with paragraph (b) of this section.

(ii) Documents to support the decisions and analyses, including any modifications, justifications, variances, deviations and determinations made, and actions taken, to implement and evaluate each element of the integrity management program listed in paragraph (f) of this section.

(2) See Appendix C of this part for examples of records an operator would be required to keep.

(m) *How does an operator notify PHMSA?* An operator must provide any notification required by this section by:

(1) Entering the information directly on the Integrity Management Database Web site at <http://primis.phmsa.dot.gov/imdb/>;

(2) Sending the notification to the Information Resources Manager, Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration, 1200 New Jersey Avenue, SE., Washington, DC 20590; or

(3) Sending the notification to the Information Resources Manager by facsimile to (202) 366-7128.

[Amdt. 195-70, 65 FR 75406, Dec. 1, 2000, as amended by Amdt. 195-74, 67 FR 1660, 1661, Jan. 14, 2002; Amdt. 195-76, 67 FR 2143, Jan. 16, 2002; 67 FR 46911, July 17, 2002; 70 FR 11140, Mar. 8, 2005; Amdt. 195-85, 70 FR 61576, Oct. 25, 2005; Amdt. 195-87, 72 FR 39017, July 17, 2007; 73 FR 16571, Mar. 28, 2008; 73 FR 31646, June 3, 2008; Amdt. 195-94, 75 FR 48607, Aug. 11, 2010]

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## Appendix C HCA Identification Checklist

Date: 11/1/2015

Operator: Panther Operating Company - High Island Pipeline System

Segment: A-474 to Texas City Station

Length: 91 miles Diameter: 14 WT: 0.375 Grade: X42

State: Texas/Offshore County(s): Galveston City/Town: Galveston/Texas City

MAOP: 1440 PIR: N/A Class: N/A

Commodity Transported: Crude Oil 100% SMYS: 2,250

### Gas Transmission Pipelines

- |  | Y                        | N                        |
|--|--------------------------|--------------------------|
| 1 Is any portion of the gas pipeline designated as a Class 3 or 4?                   | <input type="checkbox"/> | <input type="checkbox"/> |
| 2 If # 1 above is yes, will this be used for HCA designation?                        | <input type="checkbox"/> | <input type="checkbox"/> |
| 3 If # 1 above is no, is the calculated PIR greater than 660 feet?                   | <input type="checkbox"/> | <input type="checkbox"/> |
| 4 If # 3 above is yes, does the PIR contain 20 or more houses or an identified site? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5 If # 4 above is yes, will this be used for the HCA designation?                    | <input type="checkbox"/> | <input type="checkbox"/> |
| 6 Does the calculated PIR (regardless of size) contain 20 or more houses?            | <input type="checkbox"/> | <input type="checkbox"/> |
| 7 Does the calculated PIR contain an identified site?                                | <input type="checkbox"/> | <input type="checkbox"/> |
| 8 Will #5, #6 or #7 above be utilized as the determinate of gas HCA?                 | <input type="checkbox"/> | <input type="checkbox"/> |

### Hazardous Liquid/CO2 Pipeline

- |  |                                     |                                     |
|--|-------------------------------------|-------------------------------------|
| 1 Does the pipeline cross a navigable waterway?                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 2 Is the pipeline within an area designated high population (>50k & 1000 sq. mi.)? | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 3 Is the within an "other populated area" (concentrated population)?               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 4 Is the pipeline within or could it affect a Unusually Sensitive Area (USA)?      | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 5 Please indicate which condition above will be used as determinate of HCA.        | <input type="checkbox"/> 1,3 & 4    |                                     |

### Analysis

Describe the findings based on the above checklist and clearly identify the section of pipeline affected including latitude/longitude, milepost, geographic or other feature.

This pipeline extends from approximately 61 miles offshore and traverses Galveston Island and Galveston Bay, an additional 30 miles. Approximately 30 miles of the 91 miles of pipeline resides within an HCA and is included in Panthers IMP program.

Signed: M. Reagan Date: 11/1/2015