



**Vintage Production California LLC**

A subsidiary of Occidental Petroleum Corporation 

Via Express Mail

February 24, 2011

Mr. Chris Hoidal, Western Region Director  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

**RE: Notice of Probable Violation and Proposed Compliance Order (CPF 5-2011-0005)**

Dear Mr. Hoidal:

Vintage Production California LLC (VPC) received the Department of Transportation (DOT) Notice of Probable Violation (CPF5-2011-0005) letter (dated January 14, 2011) on January 20, 2011. CPF-2011-0005 addresses the PHMSA inspection of VPC Operations and Maintenance (O&M) manuals and records for the Santa Paula gas system on August 23-26, 2010. This Notice addresses external corrosion control.

In regard to Item Number 1 of the Notice: "Vintage's high pressure sales gas pipeline from the Santa Clara Valley Gas Plant to the SoCal pipeline is not being cathodically protected. The pipeline, which was constructed in 1960, is partially coated with Polyken tape and Fusion Bonded Epoxy, but has no cathodic protection. Each buried transmission line installed before August 1, 1971, that has an effective external coating must be cathodically protected along the entire area that is effectively coated. If the pipeline is bare or ineffectively coated, it must be cathodically protected."

VPC is planning to install cathodic protection on its Santa Paula Valley Gas Plant High Pressure pipeline (SCVGP HP gas pipeline). The following table describes the calendar and current status of the implementation:

Action Plan	Completion Date	Status	Observations
Field testing (current requirements)	Jan 30-08	Complete	
CP Design and proposal	Feb 15-11	Complete	
Project approval	Feb 28-11	Complete	Approved (Feb 24-11)
Installation power supply and anode bed	Apr 30-11	On going	Visiting installation sites (last week Jan)
Commissioning and Final testing	May 30-11		

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Please contact me at 661-869-8283 concerning questions and follow up CPF-2011-0005.

Sincerely,



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Mark Birk  
Risk Manager Coordinator  
Vintage Production California LLC

cc: A. Herrera (VPC)  
H. Monfared (USDOT)