Chevron

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March 10, 2015

Mr. Rod M. Seeley
Director, Southwestern Region
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner, Suite 1110
Houston, Texas 77074

RE: CPF 4-2015-5002M

Dear Mr. Rod Seeley:

Chevron Pipe Line Company (CPL) has completed the corrections to our procedures, as recommended in the above referenced Notice of Amendment dated February 17, 2015. Please see the attached documents, which detail in redline the revisions made to each procedure.

Please contact Randy Burke at 713-432-3206 if you have questions or require additional information.

Sincerely,

Terry Duhon

Attachments

Electronic Transmittal
cc: J. M. Barnum, General Manager - Pipeline
Joel Youngblood, CPL Supervising Counsel
Gary Saenz, DOT Team Lead

10.0 Corrosion Control Procedures

Pipeline systems operated by Company regardless of construction date must have a corrosion prevention program that protects metallic structures from external, internal, and atmospheric corrosion. These procedures include the design, installation, operation, and maintenance of cathodic protection, internal corrosion protection, and coating systems, carried out by or under the direction of qualified personnel.

- The Supervisor of Corrosion Control must have thorough knowledge of the corrosion control procedures under which the pipelines and pipeline facilities under their supervision are operated to insure compliance with *49 CFR Part 195*. Cathodic protection systems must be maintained and inspected in accordance with Company's MIP-501 *Cathodic Protection.*
- Internal corrosion protection systems must be maintained and inspected in accordance with Company's MIP-502 *Internal Corrosion Control.*
- Atmospheric corrosion protection systems must be maintained and inspected in accordance with Company's MIP-503 *Coating Inspection and Repair.*
- Inspection and repair of coating on above-ground storage tanks is performed in accordance with Company's MIP-504 *Tank Coating Inspection and Repairs.*
- Direct examination and/or mitigation of external stress corrosion cracking is performed in accordance with Company's MIP-505 *SCC Mitigation Plan.*

10.1 The Supervisor of Corrosion Record Retention

Appendix W of this Manual contains the retention requirements of records applicable to this section.

DC – Direct Current

FDC – Field Data Collection

FRP – Fiber Reinforced Pads

IR – Intensity Resistance

MIP – Maintenance and Inspection Procedures

OQ – Operator Qualification

P/S – Pipe-to-Soil

SAP-PM – SAP Plant Maintenance

3.2 Definitions

Continuity Bond – a connection that provides electrical continuity between structures that can conduct electricity.

Critical Bond – a bond, interference of continuity, whose failure would jeopardize the structural integrity of the Company system.

Interference Bond – an intentional metallic connection, between metallic systems in contact with a common electrolyte, designed to control electrical current interchange between the systems.

Test Lead – The wire or cable connected to the pipeline for the purpose of taking structure to electrolyte readings, the test lead insulation should be color coded when connected to multiple structures at a test point, such as a foreign line crossing or at a casing. See Note below.

Test Point – A location on the pipeline or tank where the structure to electrolyte readings are taken. See Note below.

Test Station – The equipment comprising a test point typically composed of test leads, conduit, support structure (post), protective housing and connections for taking structure to electrolyte readings. Some test stations include bonds, with their associated equipment such as shunt and resistor (or resistance wire). See Note below.

Note: The terms test point, test lead, and test station are often used interchangeably in general conversation.

2. Rectifiers and other impressed current sources shall be visually inspected and maintained during or immediately preceding the pipeline annual survey. The annual rectifier inspection shall be performed as detailed in Appendix A.

3. Safety guidelines are to be used during rectifier inspections.

WARNING: Test rectifier case prior to first touching a rectifier cabinet as it may have become electrically charged due to a short.

WARNING: Snakes or stinging insects may be nesting in the vicinity of the rectifier. Take appropriate precautions to prevent injury.

4. The rectifier inspector should report all rectifier operational problems and record them in the accepted CP software package.

5. All repairs, installation of new equipment, or any other modification to the cathodic protection systems must be performed by or under the supervision of qualified/trained personnel.

SAFETY WARNING: Turn off external A/C power switch before performing any corrective procedures inside the rectifier case.

6.4 Bond Inspections

1. Each reverse current switch, each diode, and each interference bond whose failure would jeopardize structure protection must be electrically checked for proper performance six (6) times each year, but with intervals not exceeding 2-1/2 months.

2. All other ~~critical~~ bonds must be checked at least once each calendar year, but with intervals not exceeding 15 months.

3. If the bond is not operating properly, it must be repaired or its resistance adjusted to correct the problem before the next scheduled inspection.

4. The inspector shall report discovered problems that cannot be corrected immediately to the Field Team Leader.

6.5 Annual Surveys

1. At intervals not to exceed 15 months, but at least once each calendar year, all lines, buried station facilities, and storage tank bottoms under cathodic protection will be tested for adequate cathodic protection.

2. Tests done during the annual survey include:

7.0 Safety Measures to Be Considered

1. When lowering a pipeline while in service, the job-site supervisor shall ensure that adequate, continuous channels of communication exist to shut the line down in the event of emergency.

2. If any line of communication is lost, lowering shall be suspended until such communication is restored. Line of communication shall also include supervisory control.

3. Consideration that the line be scheduled down and the nearest upstream and downstream block valves closed during movement shall be given before any operating pipeline is moved.

4. If a shutdown is not practical then the following paragraphs apply:

   a. For non-HVLs the pressure shall be reduced to less than or equal to 50% of MOP at the point of pipe movement

   b. If it is impractical to schedule an HVL pipeline outage prior to lowering, the pressure in the line section must be reduced to the lower of the following:

   1) Pressure shall be reduce to less than or equal to 50% of MOP at the point of pipe movement, OR

   2) Lowest practical pressure that will maintain the HVL in a liquid and flowing state but not less than 50 PSI above the HVL's vapor pressure.

NOTE: If the above safety measures cannot be met due to extreme circumstances, an MOC deviation request shall be submitted for approval by the Asset Manager.

5. If HVL is contained in the section being lowered:

   a. Radio-equipped personnel should be stationed at the closest upstream and downstream block valves and be in contact with the supervisor at the work site, OR

   b. The line should be shut-down and those block valves closed.

6. Personnel are not permitted in the ditch while the line is being lowered or at any time while the line is supported by equipment except after movement of pipe has ceased and personnel are removing pipeline supports.

7. Vehicles and communication equipment shall be readily accessible and positioned so any potential leak would not interfere with their safe operation.

8. Where the pipeline being lowered is near populated areas, consult the appropriate Facility Engineering Group for additional precautions along with local Field Team Leader.

9. Refer to HES Standards as applicable, including HES-119, HES-201, HES-202, HES-204, HES-207, HES-208, HES-210, HES-220.