

September 19, 2023

**VIA ELECTRONIC MAIL TO: vishal\_gupta@oxy.com**

Vishal Gupta  
President and General Manager for Oxy EOR  
Bravo Pipeline Company  
5 Greenway Plaza Suite 110  
Houston, Texas 77046

**Re: CPF No. 4-2023-039-NOPV**

Dear Mr. Gupta:

Enclosed please find the Final Order issued in the above-referenced case. It makes a finding of violation and specifies actions that need to be taken to comply with the pipeline safety regulations. When the terms of the compliance order are completed, as determined by the Director, Southwest Region, this enforcement action will be closed. Service of the Final Order by e-mail is effective upon the date of transmission and acknowledgement of receipt as provided under 49 C.F.R. § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

Enclosures (Final Order and NOPV)

cc: Mr. Bryan Lethcoe, Director, Southwest Region, Office of Pipeline Safety, PHMSA  
Mr. Mark Hamlin, Managing Counsel, Occidental Petroleum Company,  
mark\_hamlin@oxy.com  
Mr. Bradey Holland, Lead, Plant Operations, Bravo Pipeline Company,  
bradey\_holland@oxy.com

**CONFIRMATION OF RECEIPT REQUESTED**

**U.S. DEPARTMENT OF TRANSPORTATION  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION  
OFFICE OF PIPELINE SAFETY  
WASHINGTON, D.C. 20590**

\_\_\_\_\_  
**In the Matter of**

**Bravo Pipeline Company,  
a subsidiary of Occidental Petroleum Corp.,  
Respondent.**

)  
)  
)  
) **CPF No. 4-2023-039-NOPV**  
)  
)  
)  
)

**FINAL ORDER**

On May 11, 2023, pursuant to 49 C.F.R. § 190.207, the Director, Southwest Region, Office of Pipeline Safety (OPS), issued a Notice of Probable Violation (Notice) to Bravo Pipeline Company (Respondent). The Notice proposed finding that Respondent had violated the pipeline safety regulations in 49 C.F.R. Part 195. The Notice also proposed certain measures to correct the violation. Respondent did not contest the allegation of violation or corrective measures.

Based upon a review of all the evidence, pursuant to § 190.213, I find Respondent violated the pipeline safety regulations listed below, as more fully described in the enclosed Notice, which is incorporated by reference:

49 C.F.R. § 195.452(l)(1)(ii) (**Item 1**) — Respondent failed to maintain records to support the decisions and analyses, including any modifications, justifications, variances, deviations, and determinations made, and actions taken, to implement and evaluate each element integrity management program.

This finding of violation will be considered a prior offense in any subsequent enforcement action taken against Respondent.

**Compliance Actions**

Pursuant to 49 U.S.C. § 60118(b) and 49 C.F.R. § 190.217, Respondent is ordered to take the actions proposed in the enclosed Notice to correct the violation. The Director may grant an extension of time to comply with any of the required items upon a written request timely submitted by the Respondent and demonstrating good cause for an extension. Upon completion of the ordered actions, Respondent may request that the Director close the case. Failure to comply with this Order may result in the assessment of civil penalties under 49 C.F.R. § 190.223 or in referral to the Attorney General for appropriate relief in a district court of the United States.

The terms and conditions of this order are effective upon service in accordance with 49 C.F.R. § 190.5.

September 19, 2023

---

Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

---

Date Issued