

**Before the
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
Washington, D.C.**

In the Matter of	)	
	)	
Kinder Morgan, LLC ¹	)	CPF No. 5-2023-003-NOPV
	)	Notice of Probable Violation
Respondent.	)	
	)	

Kinder Morgan, Inc. Pre-Hearing Brief

I. Introduction

The Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) issued a Notice of Probable Violation (NOPV), proposed civil penalty, and proposed compliance order (PCO) to Kinder Morgan, Inc. (KM) relating to SFPP, L.P.'s (SFPP) pipeline from Long Beach, California to Yuma, Arizona on April 11, 2023. SFPP is an indirect subsidiary of KM and the owner and operator of the pipeline at issue. The NOPV alleged one probable violation of the 49 C.F.R. § 195.583(c) regulations related to atmospheric corrosion, proposed a civil penalty of \$81,500, and issued a proposed compliance order (PCO) to require SFPP to conduct an atmospheric corrosion inspection and implement repairs pursuant to its procedures. SFPP timely responded to the allegations in the NOPV on May 11, 2023 to (1) contest the NOPV in its entirety by filing a request for a hearing to address the factual and legal issues presented by the NOPV and (2) request an informal settlement conference to clarify the facts at issue, documentation, and the applicable law.

Following issuance of the NOPV, PHMSA issued a request for information on June 16, 2023, for specific atmospheric inspections and procedures to which SFPP timely responded on June 27, 2023.² The parties subsequently convened informal settlement meetings beginning on September 5, 2023, to resolve this issue in lieu of a hearing. After granting an extension for settlement

¹ The NOPV was issued to Kinder Morgan, LLC, which appears to be an error and should have been Kinder Morgan, Inc.

² Attachment A: SFPP Response to PHMSA Jun. 16, 2023 Information Request (Jul. 27, 2023). This included the Jan. 2023 LS-120 Compton Creek Crossing Atmospheric Evaluation; Form L-OM900-03 Atmospheric Survey for inspection cycles prior to 2023; Form L-OM200-02 Pipeline Inspection/Repair Reports; and Liquid Operations and Maintenance (L-O&M) Coating Pipelines Procedure. SFPP completed the L-OM900-03 forms at PHMSA's Jun. 16th 2023 direct request, even though SFPP procedures do not require such forms for the relevant monitoring.

discussions, PHMSA scheduled a hearing for February 14, 2024, with a deadline of February 5, 2024 for submission of prehearing materials. While the parties coordinated to resolve this dispute, an agreement ultimately could not be reached. As such, SFPP timely files this pre-hearing brief and supporting attachments requesting that the NOPV be withdrawn in its entirety, including the proposed civil penalty and the PCO. PHMSA is simply wrong as a matter of fact and law, and there is no evidence that suggests otherwise.

This matter presents a single straightforward issue: whether SFPP identified actionable atmospheric corrosion at the locations identified in the NOPV. PHMSA's allegation is premised on claims of "excessive corrosion with pitting" on the Compton Creek span of the LS-120 pipeline and "additional areas of concern" at the Colton terminal station (Colton Station). Contrary to the NOPV allegations, SFPP has never identified any actionable atmospheric corrosion on the Compton Creek span or the Colton Station in these areas, and there is no factual or legal support for PHMSA to assert otherwise. The Company's determination is based on comprehensive atmospheric corrosion monitoring which occurred before and after the 2022 PHMSA inspection and is based on investigation, testing, and experience appropriate to the pipeline environment in southern California from qualified corrosion subject matter experts (SMEs). This determination has been further confirmed most recently by an independent third-party corrosion expert with over 40 years of experience in corrosion control and decades of experience with pipeline safety regulations.

PHMSA's allegations are based solely on the speculative observations and photographs of PHMSA inspectors in the field from October – November 2022. In support of this pre-hearing brief, SFPP is attaching records detailing seven atmospheric corrosion evaluations performed by experienced and qualified corrosion SMEs employing where necessary precise corrosion detection and measurement tools before and after PHMSA's inspection, including third-party corrosion expert Kevin Garrity with Mears, Inc. At no time did SFPP or Mr. Garrity identify metal loss, pitting, or any condition that would affect the safe operation of the pipeline before the next scheduled inspection. In certain limited areas, the pipe exhibits only a light surface oxide that is protective of the pipe condition and which PHMSA regulations expressly except from remediation based on test, investigation, or experience appropriate to the environment.

II. Repaint Is Not Required Where Corrosion Is "Only a Light Surface Oxide" or "Will Not Affect the Safe Operation of the Pipeline."

In the NOPV, PHMSA alleges that "KM failed to protect against atmospheric corrosion as required." PHMSA asserts that during the PHMSA field inspection, atmospheric corrosion on LS-120 was identified, at a span crossing Compton Creek (MP 1.85), including "excessive corrosion with pitting." PHMSA further alleges that "[a]fter finding atmospheric corrosion during the inspection, KM failed to provide protection against corrosion as required by § 195.581."

The regulation at 49 C.F.R. § 195.583 cross-references corrosion mitigation requirements at 49 C.F.R. § 195.581, which includes a longstanding exception from "providing protection against corrosion" where an operator "demonstrate[s] by test, investigation, or experience appropriate to the environment of the pipeline that corrosion will (1) only be a light surface oxide; or (2) not affect the safe operation of the pipeline before the next scheduled inspection." Pursuant to this

exception, peeling paint is not atmospheric corrosion and not all surface oxide or rust requires remediation.

A. PHMSA Guidance Clarifies that Light Surface Oxide Does Not Require Remedial Action and May be Protective of the Pipe Metal.

In promulgating this allowance, PHMSA's predecessor agency explained:

Final § 195.581 gives operators flexibility when deciding to coat pipelines where atmospheric corrosion will be limited to a light surface oxide, or will not affect the safe operation of the pipeline before the next scheduled inspection.

Final Rule, *Controlling Corrosion on Hazardous Liquid and Carbon Dioxide Pipelines*, 66 Fed. Reg. 66994, 67001 (Dec. 27, 2001). In response to a public commenter that opposed the requirement that would allow pipe to "remain unprotected and unrepaired," the rulemaking preamble further clarified (*id.* (emphasis added)):

[T]he need for coating would be reviewed again in 3 years. A 3-year delay in coating a pipeline judged to be safe should not jeopardize public safety, considering that atmospheric corrosion generally progresses at a slow rate. Therefore, we did not adopt [the public commenter's] comment. Nevertheless, mindful of [the public commenter's] concern, we edited the final wording to clarify that any decision not to coat a particular pipeline must be supported by testing, investigation, or experience relevant to that pipeline.

PHMSA guidance also provides that a light surface oxide means "general oxidation of the metal where there is no associated loss of metal" or "the slow rusting of pipe which is not yet considered to be atmospheric corrosion because there is no evidence of metal loss." *PHMSA Corrosion Enforcement Guidance Part 195* at 87, 90 (Jun. 22, 2016). Consistent with this guidance, PHMSA has explained with respect to the corollary Part 192 provision, "that a light surface oxide is a non-damaging form of corrosion that does not need remedial action" and that it "believes operators should have the option of assigning resources to problems that pose a higher near-term risk." See Final Rule, *Further Regulatory Review: Gas Pipeline Safety Standards*, 68 Fed. Reg. 53895, 53897-98 (Sept. 15, 2003); see also Notice of Proposed Rulemaking, *Controlling Corrosion on Hazardous Liquid and Carbon Dioxide Pipelines*, 65 Fed. Reg. 76968, 75978 (Dec. 8, 2000) (rejecting a request to "except all but 'active corrosion' from the atmospheric corrosion protection requirement" and explaining "[t]he intent of the recommendation is to distinguish harmless rust from serious metal loss"). PHMSA has also recognized that light surface oxide may even be beneficial and protective of the pipe surface. See *PHMSA Corrosion Enforcement Guidance Part 195* at 90 (Jun. 22, 2016) ("Some corrosion experts consider a light surface oxide to be protective to the metal surface.").

B. Remediation is Required for Areas of Metal Loss, Pitting, or Peeling Scale of the Steel Surface.

In contrast to light surface oxide, atmospheric corrosion warranting remediation is "an area of metal loss due to general corrosion, localized corrosion pitting, or peeling scale on the steel surface

that has damaged the pipe.” *Id.* at 87. In PHMSA’s corrosion enforcement guidance under both Parts 192 and 195, the Agency explains that “pictures, operator’s personnel statements, records, documented evidence of pipe wall loss at interfaces” can be evidence of an alleged violation of either 49 C.F.R. §§ 192.479 or 195.581. *Id.* This is consistent with enforcement precedent where PHMSA has issued allegations based on pitting, peeling scale of the pipe steel (not the paint coating), and excessive corrosion. *See, e.g., Warning Letter, In re: Chevron*, CPF 5-2019-5003W (Jan. 27, 2019) (alleging a warning item under 49 C.F.R. § 195.581 based on a pipeline “without coating and with severe atmospheric corrosion” and appears to have existed for several years) (emphasis added); *Warning Letter, In re: Conoco Phillips Alaska, Inc.*, CPF 5-2017-6030W (Aug. 15, 2017) (alleging a warning item under 49 C.F.R. § 195.583 based on the presence of oxidation “as well as scaling and pitting”) (emphasis added). There is not any published PHMSA enforcement issued to an operator solely for peeling paint or harmless rust of the pipe.

C. PHMSA Provides Operators Latitude to Demonstrate Applicability of the Exception.

PHMSA does not specify in the federal pipeline safety regulations or in guidance any requirements to inform the operator’s specific testing, investigations, or experience appropriate to the environment of the pipeline beyond the plain language of 49 C.F.R. § 195.581(c). PHMSA only defines “pipeline environment” at 49 C.F.R. § 195.553 to include “soil resistivity (high or low), soil moisture (wet or dry), soil contaminants that may promote corrosive activity, and other known conditions that could affect the probability of active corrosion.” PHMSA guidance and enforcement suggest, however, that operators have wide latitude in using a “test, investigation, or experience” to satisfy the exception at 49 C.F.R. § 195.583(c). For example, PHMSA has explained with respect to the Part 192 corollary atmospheric corrosion exception that “operators do not have to protect aboveground pipelines from atmospheric corrosion if they demonstrate the corrosion will have certain characteristics. We require operators to demonstrate grounds for exceptions when they are the best source of information on which the exception is based.” *See Final Rule, Gas Gathering Line Definition; Alternative Definition for Onshore Lines and New Safety Standards*, 71 Fed. Reg. 13289, 13295 (Mar. 15, 2006) (emphasis added).

III. There is No Evidence of Atmospheric Corrosion Requiring Repaint.

There is no evidence in the record of atmospheric corrosion requiring protection at any of the referenced areas in the NOPV. Prior to and after PHMSA’s inspection, SFPP conducted numerous detailed atmospheric corrosion monitoring and grading inspections, performed by qualified individuals with expertise in corrosion control, to confirm that the pipeline condition in the areas at issue do not trigger a requirement to repaint the pipeline as provided by 49 C.F.R. § 195.583(c) and SFPP’s procedures. During the timeframe at issue, SFPP performed regulatorily required atmospheric corrosion monitoring every three years, with additional voluntary interim monitoring. SFPP’s demonstration that the atmospheric condition of the pipe in these areas did not require remediation is set forth in the inspector’s qualifications, investigation and inspection notations and grading determination (in consideration of SFPP’s L-O&M procedures), and experience with this pipe in the southern California environment.

A. Comprehensive Inspections Confirm No Actionable Atmospheric Corrosion.

Each of SFPP's inspections of the relevant areas referenced in the NOPV, performed by qualified corrosion experts, have repeatedly confirmed that the condition of the pipe has been properly designated as "fair"³ or "good"⁴ as defined by SFPP's procedures. *Attachment B: SFPP Procedure L-O&M 918, Inspection for Atmospheric Corrosion (Rev 9-11-2019)*. Under SFPP's procedures and consistent with 49 C.F.R. § 195.583(c), designations of "fair" and "good" do not trigger a requirement to repaint the relevant pipeline segment. Table 1 below details the inspections on the LS-120 Compton Creek span and Attachment C includes a table summarizing the inspections performed at the Colton Station. These tables are supported by three affidavits of corrosion SMEs which detail their inspections in these areas, the corrosion detection and measurement tools employed, and the experience and considerations brought to bear regarding the pipeline environment. The affidavits also attach the documentation for the inspections described.

As it relates to the Compton Creek span, qualified corrosion technician Britt Mars performed close inspections in 2019, 2020, and 2021 with the use of a ladder. During the inspections, he had a variety of tools available to use as needed and considered the pipe environment, each time confirming the grade of "Fair." *Attachment D: Affidavit of Britt Mars (Feb. 2, 2024)*. Britt Mars recommended that SFPP schedule a more thorough inspection of the span with the use of special equipment, although SFPP was unable to perform such inspections in 2022 because the equipment delivered by the contractor did not facilitate a safe work environment.

In response to concerns raised by PHMSA during its 2022 field inspection, qualified corrosion technician Micheal Pyle performed a comprehensive atmospheric corrosion inspection of the Compton Creek span, including use of the typical tools as well as a special ultrasonic digital thickness gauge. *Attachment E: Affidavit of Micheal Pyle (Feb. 2, 2024)*. His review included the specific areas identified by PHMSA during its audit. *Id.* This inspection found no evidence

³ Pursuant to SFPP Procedure L-O&M 918, Inspection for Atmospheric Corrosion (Rev 9-11-2019), Attachment 1 – Atmospheric Corrosion Inspection Guidelines: "Fair — A Fair atmospheric condition grade is defined by: 1.) Deterioration of the coating system where coating is cracking, flaking, peeling, or disbonding or, 2.) Deterioration of the topcoat that exposes the primer for significant portions of the surface area or, 3.) Atmospheric corrosion limited to uniform surface rust (the depth of which cannot be measured) of the overall surface area, or 4.) Other areas in which continued deterioration of the coating system would not impact the safe operation of the pipeline system. Representations of spot rusting, general rusting, and pinpoint rusting may be found in Industry Standards (Standards Method of Evaluating Degree of Rusting on Painted Steel Surfaces). Note: Wall loss on steel piping where uniform light rust is occurring is usually impractical to measure utilizing standard instrumentation or gauges due to the minute amount of actual wall lost. Fair atmospheric condition generally indicates that a given site will be re-evaluated in the next survey cycle at intervals not to exceed 39 months and should be brought to the attention of operations and maintenance personnel responsible for planning schedules and budgeting estimates. A site graded as Fair atmospheric condition is not considered out of compliance by applicable regulatory standards." Under SFPP's procedures, a "Fair" rating requires re-evaluation within the next 39 months.

⁴ Per L-O&M 918, Inspection for Atmospheric Corrosion (Rev 9-11-2019), Attachment 1 – Atmospheric Corrosion Inspection Guidelines a "Good" grade is "Good — A Good atmospheric condition grade is defined by: 1.) A coating system that is well bonded and intact and, 2.) Topcoat degradation that is limited to "chalking" and, 3.) Atmospheric corrosion that is limited to minor surface corrosion in flanged areas, nuts, bolts, and areas affected by routine maintenance operations. Local operations personnel may perform spot repairs in order to mitigate isolated corrosion discontinuities." Note that a "Good" rating does not require that there be no indications of atmospheric corrosion; minor surface corrosion is acceptable and does not require immediate attention.

of metal loss, pitting, or any condition that would affect the safety of the pipeline before the next scheduled inspection, confirming a grade of “Fair” and contradicting PHMSA’s speculations from the inspection. *Id.* Additional comprehensive inspections were performed by SFPP in May and November 2023 by qualified corrosion technician Walter Yarbrough. *Attachment F: Affidavit of Walter Yarbrough (Feb. 2, 2024)*. Again, the evaluation found no evidence of metal loss, pitting, or any condition that would affect the condition of the pipe before the next schedule inspection. The pipe condition rating was confirmed as “Fair.”

Most recently, the areas identified in the NOPV were reviewed by independent third-party corrosion expert Kevin Garrity with Mears, Inc., on January 11, 2024. *Attachment G: Mears Atmospheric Corrosion Evaluation for SFPP Performed by K. Garrity (Feb. 2, 2024)*. Mr. Garrity’s report provides “[t]o date, the corrosion observed during the inspections of the SFPP piping referenced by PHMSA is only cosmetic in nature, not potentially injurious to safety and does not adversely affect the safe operation of these assets.” *Id.* at p. 9. Further (*id.* at p. 12),

While there is no question that peeling paint has been identified on Line 120-1 at the Compton Creek crossing, SFPP has satisfied the requirements for testing and investigations and can clearly demonstrate that it satisfies both conditions set forth in the regulations. All evidence indicates that the observed corrosion is both light surface oxide and the extent of corrosion will not affect safe operation.

Table 1. Atmospheric Corrosion Inspections of Compton Creek Span

Inspection Date	Atmospheric Corrosion Grading/Finding	Inspection Tools Available/Considerations					Required Follow-Up
		Pit depth gauge	Ruler	Coating removal tool and sandpaper	Fine tip hook probe	UT digital thickness gauge	
Aug. 13, 2019 (SFPP)	Fair	X	X	X	X	NA	Re-evaluation within 39 months
Sep. 24, 2020 (SFPP)	Fair	X	X	X	X	NA	Re-evaluation within 39 months
Dec. 3, 2021 (SFPP)	Fair	X	X	X	X	NA	Re-evaluation within 39 months
Oct. – Nov. 2022 (PHMSA)	<i>PHMSA Field Visual Observations Alleging “Excessive corrosion with pitting” with no tools employed.</i>						
Jan. 26, 2023 (SFPP)	Fair	X	X	X	X	X	Re-evaluation within 39 months
May 23-31, 2023 (SFPP)	No evidence of atmospheric corrosion.	Air to soil interfaces voluntarily repainted per SFPP’s coating maintenance program.					NA
Nov. 13, 2023 (SFPP)	Fair	X	X	X	X	X	Re-evaluation within 39 months
Jan. 10-11, 2024 (Mears Inc.)	No evidence of atmospheric corrosion.	Close visual examination, pit depth gauge, Bresle patch, surface contaminant acceptability testing (SCAT).					NA

B. PHMSA Cannot Substantiate Its Claims of Excessive Corrosion, Pitting, or Actionable Atmospheric Corrosion.

The allegations in PHMSA’s NOPV are based on conclusory and speculative visual observations from the field and at a substantial distance from the pipeline. PHMSA’s limited observations have no basis in any actual investigation, testing or evaluation, to support the Agency’s visual observations of these difficult to access areas and PHMSA has not provided any technical data to support its conclusions. No measurements of pit depths or wall loss were documented by PHMSA, nor is there any photographic evidence of excessive corrosion pitting. As it relates to the Colton Station, PHMSA itself admits that it was “unable to determine the severity of the atmospheric corrosion” while performing the inspection because the valves at issue were located in vaults.

The detailed inspections conducted by SFPP – in contrast – were based on testing and evaluation conducted by experienced corrosion SMEs and included close proximity surveys to the pipe as well. These inspections involved the use of a variety of tools to confirm that there is no metal loss or pitting on the pipe surface, including Thorpe pit gauges, fine tip hook probes, ruler, sandpaper, and ultrasonic digital thickness gauges where noted. During the inspections, these SMEs also relied on their experience appropriate to the environment of the pipeline, in this case Southern

California. Each of these inspections reached the same conclusion: there is no atmospheric corrosion that warrants further protection on the pipeline.

There is no evidence in the record of metal loss, pitting, or scaling of the pipe steel. SFPP's inspections documented only limited instances of light surface oxide without any evidence of metal loss, which precisely meets the clear and unambiguous language of the exception at 49 C.F.R. § 195.581(c) and relevant PHMSA guidance. Based on qualified corrosion technicians' experience and training, including with respect to the environment of the pipeline in southern California, SFPP appropriately concluded that the pipeline condition exhibited no more than a light surface oxide and that it would not affect the safe operation of the pipeline before the next scheduled inspection. Under SFPP's procedures and consistent with 49 C.F.R. § 195.583(c), a requirement to recoat or repair the coating was not triggered and is still not triggered today. This is further supported by two metal loss in-line inspection (ILIs) tools performed in 2017 and 2022, the results of which confirmed that there was no metal loss at or near MP 1.82. *Attachment H: Compton Creek 2017 & 2022 ILI Results*.

IV. PHMSA May Not Articulate New Rules Through Enforcement.

PHMSA's NOPV raises serious due process concerns and if upheld in a Final Order constitutes arbitrary and capricious decision making and an abuse of discretion. PHMSA may not articulate new rules for the first time through enforcement. SFPP prepares and implements its procedures in reliance on PHMSA regulations, enforcement, and guidance. If PHMSA intends to expand the atmospheric corrosion regulations to require repainting of pipe with only light surface oxide that does not impact the integrity of the pipeline before the next scheduled inspection, thereby nullifying a longstanding exception at 49 C.F.R. § 195.581(c), it must go through notice and comment rulemaking required by the Administrative Procedure Act to provide fair notice and due process under the U.S. Constitution and the Administrative Procedure Act.

The U.S. Constitution and the Administrative Procedure Act require that a regulation provide a regulated entity with fair notice of the obligations it imposes and be issued pursuant to notice and comment rulemaking. *The Constitution of the United States, Amendment 5*; 5 U.S.C. § 554(b). Courts have found that fair notice requires the agency to have "state[d] with ascertainable certainty what is meant by the standards [it] has promulgated. [...] must give [a party] fair warning of the conduct it prohibits or requires, and it must provide a reasonably clear standard of culpability to circumscribe the discretion of the enforcement authority and its agents." *ExxonMobil Pipeline Co v. U.S. DOT*, 867 F.3d 564, 578 (5th Cir. 2017) (citing *Diamond Roofing Co., Inc. v. OSHRC*, 528 F.2d at 645, 649 (5th Cir. 1976)).

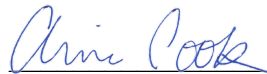
An agency may not enforce regulations according to "what an agency intended but did not adequately express..." *Gates v. Fox Co., Inc. v. OSHRC*, 790 F.2d 154, 156 (D.C. Cir. 1986). "Even if the [Agency's] interpretation were reasonable, announcing it for the first time in the context of this adjudication deprives Petitioners of fair notice. Where, as here, a party first receives actual notice of a proscribed activity through a citation, it implicates the Due Process Clause of the Fifth Amendment." *Fabi Constr. Co. v. Sec'y of Labor*, 508 F.3d 1077, 1088 (D.C. Cir. 2007). Regulated entities are not obligated to "divine the agency's interpretations in advance or else be held liable when the agency announces its interpretations for the first time in an enforcement

proceeding and demands deference.” *Christopher v. SmithKline Beecham Corp.*, 132 S. Ct. 2156, 2167 (2012).

V. Conclusion and Request for Relief.

For the reasons identified in this Pre-Hearing Brief, in SFPP’s Request for Hearing, and for other reasons as justice may require, SFPP respectfully requests that the NOPV be withdrawn in its entirety, including the proposed civil penalty of \$81,500, and the associated PCO obligations. PHMSA bears the burden of proof of all elements of a proposed violation in an enforcement proceeding. *See, e.g., Final Order, In re: ANR Pipeline Co*, CPF 3-2011-1011 (Dec. 31, 2012). As set forth above, PHMSA has not met its burden of proof with respect to either the legal basis or the factual evidence to support the NOPV.

Respectfully submitted,



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Attachments to Pre-Hearing Brief

- A. SFPP Response to PHMSA Jun. 16, 2023 Information Request (Jun. 27, 2023)
 - 1. LS-120 Compton Creek Crossing Atmospheric Evaluation (Jan. 31, 2023)
 - 2. SFPP Form L-OM900-03 Atmospheric Survey for 2 Previous Inspection Cycles Prior to 2023 Inspection (prepared in response to PHMSA's direct request)
 - 3. Form L-OM200-02 Pipeline Inspection/Repair Report
 - 4. L-O&M203 Coating Pipelines Procedure
- B. SFPP Procedure L-O&M 918, Inspection for Atmospheric Corrosion (Rev 9-11-2019)
- C. Summary of Colton Station Atmospheric Corrosion Inspections (2019-Present)
- D. Affidavit of Britt Mars (Feb. 4, 2024)
 - 1. Exhibit A, Atmospheric Corrosion Control Inspections 2019, 2020, 2021 (Compton)
 - 2. Exhibit B, Atmospheric Corrosion Control Inspections 2019, 2020, 2021, 2022 (Colton Station C-29, C-31, launcher and receiver)
 - 3. Exhibit C, Operator Qualifications
- E. Affidavit of Micheal Pyle (Feb. 4, 2024)
 - 1. Exhibit A, Atmospheric Corrosion Inspection Report (Jan. 31, 2023)
 - 2. Exhibit B, Operator Qualifications
- F. Affidavit of Walter Yarbough (Feb. 5, 2024)
 - 1. Exhibit A, Pipeline Inspection/Repair Reports (May 5, 2023)
 - 2. Exhibit B, Atmospheric Corrosion Evaluation Report (Nov. 27, 2023)
 - 3. Exhibit C, Operator Qualifications
- G. Mears Atmospheric Corrosion Evaluation for SFPP Prepared by Kevin Garrity (Feb. 5, 2024)
- H. Compton Creek Inline Inspection Data (2017, 2022)