

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY**

**In the Matter of
Chevron Pipe Line Company,

Respondent.**

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) **CPF No. 5-2025-014-NOPV**
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**REQUEST FOR INFORMAL CONFERENCE, REQUEST FOR HEARING,
PRELIMINARY STATEMENT OF ISSUES, AND REQUEST FOR DOCUMENTS**

I. Request for Informal Conference

Pursuant to 49 U.S.C. § 60117(b)(1)(B), Chevron Pipe Line Company (Chevron) respectfully requests an informal conference to discuss the allegation and compliance order in Item 2 of the above-referenced Notice of Probable Violation and Proposed Compliance Order (NOPV). Chevron is hopeful that through further discussion of the relevant facts and circumstances this allegation can be resolved without a hearing.

II. Request for Hearing

Pursuant to 49 C.F.R. §§ 190.208(b)(4) and 190.211(b), Chevron respectfully requests an in-person hearing to discuss the alleged violation and proposed compliance order in Item 2. If a hearing is held, Chevron will be represented by counsel at the hearing.

III. Preliminary Statement of Issues

Chevron respectfully contests the allegation and proposed compliance order in the NOPV for Item 2. At the hearing, Chevron intends to raise the following issues:

Item 2-49 C.F.R. § 195.465

- A. Whether the allegation of violation is supported by the facts and the evidence.
- B. Whether the proposed compliance order is appropriate and should be withdrawn.

IV. Request for Documents

Pursuant to 49 C.F.R. §§ 190.209(b)(2), 190.212(c)(2), (c)(3), (c)(7), and the Office of Chief Counsel memorandum related to the contents of an enforcement proceeding case file,¹ Chevron respectfully requests copies of any exhibits related to Item 2 in PHMSA's Violation Report for this matter, as well as any other pertinent notes, documents, or electronic records PHMSA generated or maintains relating to Item 2.

Chevron reserves the right to supplement this preliminary statement of issues in response to any additional information or arguments from PHMSA.

Respectfully submitted this 2nd day of July
2025.

Chevron Pipe Line Company,

Carol Strang
Regulatory Specialist

¹ <https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/2025-06/PHMSA%20Chief%20Counsel%20Memo%20-%20Revised%20Procedures%20for%20Determining%20the%20Contents%20of%20the%20Case%20File%20in%20Pipeline%20Safety%20Enforcement%20Proceedings.pdf>