

Comments Form for Proposed Rulemakings §3.70: Amend T-4 pipeline permit procedures

3.70 Pipeline Permits Required.

a. Each operator of a pipeline or gathering system subject to the jurisdiction of the Commission shall obtain a pipeline permit, renewable annually, from the Commission as provided in this rule.

Comment:

The current requirement "from an tract of land within this state" is easily interpreted. The proposed amendment will add pipeline systems inside an operator's tract of land such as a production lease, refinery, tank farm or terminal. The proposed amendment "subject to the jurisdiction of the Commission" needs to be defined.

3.70 (b) (4) documentation to provide support for the classification and and purpose being sought for the pipeline, if applicable, and any other information requested by the Commission.

Comment:

This section needs clarification. Without clarification a permit request or admendment will see unnecessary delays responding to additional documentation.

Respectfuily submitted, James Trevino Valero One Valero Way San Antonio, TX 78249

Railroad Commission of Texas | (877) 228-5740 | 1701 N. Congress, Austin, Texas 78701

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Submitted By

James Trevino

One Valero Way San Antonio, TX 78249

Phone: 210.345.5145

Fax:

Email:

E-mail address preference: No, i request my e-mail address remain confidential