



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

8701 South Gessner, Suite 1110  
Houston, TX 77074

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 10, 2008

Rebecca Roberts  
President  
Chevron Pipe Line Co.  
4800 Fournace Place  
Bellaire, TX 77401-2324

**CPF 4-2008-5021W**

Dear Ms. Roberts:

On July 9-13, 2007 and September 17-21, 2007, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your West Texas LPG System (#2 and #3) in Midland and Roscoe, TX.

As a result of the inspections, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

**1. §195.420 Valve maintenance**

- (b) Each operator shall, at intervals not exceeding 7 1/2 months, but at least twice each calendar year, inspect each mainline valve to determine that it is functioning properly.**

Operator records indicated that the operator failed to inspect 17 mainline valves (to determine if the valves were functioning properly) within the 7 ½ month regulatory time limit.

Fifteen (15) valves exceeded the 7 ½ month requirement (10/03/06 to 06/04/2007), as indicated in the operator's records of SAP valve numbers for the West Texas #2 Unit.

Additionally, two (2) valves exceeded the 7 ½ month requirement (03/08/04 to 10/28/04), as indicated in the operator's records of SAP valve numbers for the West Texas #3 Unit.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in Chevron Pipe Line Co. being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2008-5021W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

A handwritten signature in black ink, appearing to read "R. M. Seeley". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous  
Materials Safety Administration