



Southwest Region,  
Office of Pipeline Safety

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U.S. Department  
of Transportation

Research and  
Special Programs  
Administration

## LETTER OF CONCERN

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 5, 1996

Mr. W. J. (Bill) Jasper, III  
Corridor Leader, Texas  
Chevron Pipe Line Company  
1400 Woodloch Forest Drive  
The Woodlands, Texas 77380

CPF No. 46517-C

Dear Mr. Jasper:

During the months of May and June 1996, a representative of the Southwest Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted a pipeline safety inspection of Chevron Pipe Line Company's onshore facilities in the Albuquerque System, in New Mexico, and the Wink-Snyder System, West Texas Gulf System, Mesa System, and West Texas LPG System, in the Texas area.

Records were reviewed in your Woodlands Office and field inspections were conducted at various unit locations. During the field review, we noted a few locations not up to the federal standards. We are concerned regarding our observations, as follows.

First, we noted in the West Texas LPG System, the #1-10" LPG line, at MP 69, appeared to lack adequate cathodic protection in 1994 and 1995. Section 195.416 (a), requires that each operator at intervals not exceeding 15 months, conduct tests to determine whether the protection is adequate. The Chevron Technical staff's explanation for this low reading was that dry and high resistant soils exist at this location and in 1995, Chevron discovered that the pipeline crossing at MP 69.7 had an interference problem. In late 1995, more anodes had been installed and the immediate result was an increase in pipe-to-soil readings to -0.860mv at MP 69.

Second, we noted in numerous locations during the field inspection that portions of the aboveground piping had not been cleaned and coated with a suitable material for the prevention of atmospheric corrosion as required by 195.416(i). The locations included: 1) On the Wink-Snyder System at block valve 14.6, the aboveground valve piping had not been cleaned and coated; 2) On the West Texas

LPG System at the Shell-Texaco tie-in, the 6" LPG line, the aboveground piping had signs of pitting. We are concerned that these and similar situations could result in a leak, such as the Telephonic Report of a leak in your Wortham Breakout Tank farm on October 28, 1996. Although this leak was due to internal corrosion, it still indicated a lack of attention to maintenance.

A third concern arose during the field visit to your Midland Station where the Mesa System and the West Texas LPG System meet, the measuring tube was leaking at the time of the field audit and it appeared to be leaking for some time. The manifold area had excessive amounts of oil on the ground. The local supervisor dispatched a technician to take care of the problem at that time. Although the problem was taken care of, it still indicated a lack of attention to maintenance.

We hope you will consider these areas of concern and strive to improve on the action taken should a similar situation occur in the future. If we can answer any questions or be of any help, please call us at (713) 718-3746.

Sincerely,

James C. Thomas, Director  
Office of Pipeline Safety  
Southwest Region