



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

March 27, 2020

Ms. Stephanie Weidman
Director, Pipeline Safety Division
Railroad Commission of Texas
1701 North Congress Avenue
Austin, Texas 78711-2967

PHMSA-2019-0071

Dear Ms. Weidman:

By letter dated February 14, 2020, the Railroad Commission of Texas (Commission) notified the Pipeline and Hazardous Materials Safety Administration (PHMSA), that pursuant to 49 USC § 60118(d), the Commission issued an amended waiver (Amended Final Order) for Oxy USA WTP LP (Oxy).

Previously, on April 1, 2019, the Commission notified PHMSA that Oxy applied for the use of a Zap-Lok connection system on the API 5L grade X-52 steel pipeline in its Wolfbone Oil Gathering System (Wolfbone System). The Wolfbone System is defined as a rural, low stress, crude oil, hazardous liquid pipeline system with 49.8 miles of 10.75-inch and 12.75-inch diameter pipe, constructed with non-welded Zap-Lok pipe connections. The Wolfbone System located in Reeves County, Texas, is regulated in accordance with 49 Code of Federal Regulations (CFR) 195.12(c)(3)(i). Subsequently, by letter dated July 3, 2019, PHMSA did not object to the Commission's waiver, provided additional conditions were met. The Commission included PHMSA's conditions in the waiver with a modification as described below.

Having reviewed the information provided in the Commission's February 14, 2020, Amended Final Order, and based on subsequent communications and meetings between the affected parties, and pursuant to 49 USC § 60118(d), PHMSA does not object to issuance of a maximum operating pressure (MOP) change granted in "Special Conditions Item 6" by the Commission in the amended waiver, as noted below:

- "Item 6: The Wolfbone System does not exceed a MOP of 204 pounds per square inch gauge (psig)."

- Note: The prior MOP was 135 psig in the Commission's waiver. The pipeline facilities have been designed and constructed to be able to operate at a 204 psig MOP. This updated MOP for the Wolfbone System will be consistent with pipeline safety.

This letter serves as PHMSA's notice of no objection to the Commission's Amended Final Order for Oxy to use an MOP of 204 psig for the Wolfbone System.

My staff would be pleased to discuss this matter or any other regulatory matter with you. Senth White, Director of Engineering and Research Division, may be contacted at 202-366-2415 for technical matters related to this waiver.

Sincerely,

A handwritten signature in blue ink, reading "Alan K. Mayberry", is positioned above a horizontal line.

Alan K. Mayberry
Associate Administrator for Pipeline Safety