



**Matthew Rodriguez**  
*Secretary for  
Environmental Protection*

# California Regional Water Quality Control Board Central Coast Region

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**Edmund G. Brown Jr.**  
*Governor*

February 17, 2012

Mr. Andrew Christie  
Sierra Club, Santa Lucia Chapter  
P.O. Box 15755  
San Luis Obispo, CA 93406  
[sierraclub8@gmail.com](mailto:sierraclub8@gmail.com)

Dear Mr. Christie:

## **SITE CLEANUP PROGRAM: RELEASES FROM OIL PIPELINES IN THE CENTRAL COAST REGION**

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff reviewed your correspondence dated July 20, 2011 and your comments from the September 1, 2011 Central Coast Water Board meeting. In follow up to your letter, John Robertson of my staff spoke with you by phone during the last week of November. Your collective comments focused on the potential environmental impacts that known and potential pipeline releases may have on the Nipomo Creek watershed. We also reviewed the questions by our Water Board members from the September meeting. In responding to these questions, we took a larger perspective and evaluated your comments with respect to active and inactive hydrocarbon pipelines throughout the Central Coast Region.

We share your focus and commitment towards cleaning up pipeline discharges that pose significant threats to water quality and the environment. To that end, we have committed a very significant portion of our groundwater staff's time towards pipeline cleanups, and this commitment of resources has resulted in the elimination of threats from a large number of pipeline leak sites throughout the region at locations that include Avila Beach, Guadalupe, San Luis Obispo, and most recently, Nipomo. We will continue evaluating and requiring cleanup of pipeline sites where these sites pose significant threat to human health, and surface water and groundwater quality, relative to the other groundwater cleanup projects we oversee.

In reviewing your letter and Board meeting comments, as well as those by the Regional Board members, Central Coast Water Board staff conducted an extensive information gathering effort to better understand the overlapping authority in active and inactive pipeline regulation. Central Coast Water Board staff also contacted two major oil companies to determine what ongoing and planned characterization and risk evaluation

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*California Environmental Protection Agency*

work exists, with respect to hydrocarbon pipelines in the Central Coast Region. Additionally, staff contacted numerous state and local agencies charged with oversight of pipeline regulation to better define the layers of pipeline oversight responsibility. This information gathering effort required significant time and we wanted to include as much as possible in this response letter, explaining the delay in responding to your original letter.

Based on this information gathering effort, this letter: 1) provides a brief history of oil pipelines in the Central Coast Region, 2) details the various agencies that oversee oil pipelines in California, 3) provides a summary of investigation and/or cleanup of pipeline releases overseen by the Central Coast Water Board, other government agencies, and pipeline operators, 4) briefly explains our cleanup site prioritization criteria and how we address high, medium, and low priority sites with our staff resources, 5) answers site-specific questions pertaining to the Nipomo Creek cleanup, and 6) provides a summary of planned additional evaluation and actions regarding potential impacts from active and abandoned pipelines.

### **HISTORY OF OIL PIPELINES IN THE CENTRAL COAST REGION**

Around 1910, Union Oil Company of California (dba Unocal, and now merged with Chevron) made an alliance with a group of small oil producers to build pipelines from the Kern County oil fields to Union Oil's Santa Maria Refinery in southern San Luis Obispo County. From there, Union Oil transported partially refined crude oil via tanker from Unocal's Avila Marine Terminal and via pipeline to the San Francisco Bay area. Limited information is available showing historic oil pipeline locations, but cleanup investigations indicate that alignments typically coincide with existing active pipelines.

In a September 22, 2004 Santa Barbara County (County) Planning Commission staff report discussing amendments to the County's Oil Transportation Policies and Regulations<sup>1</sup>, County staff stated "...In the past 20 years, largely as a result of the 1984 policies and ordinances, the County's oil transportation infrastructure has metamorphosed from a hybrid of tankering and insufficient pipeline system, to a robust common carrier pipeline system with capacity to transport oil far in excess of current production needs...". The 2004 County Planning Commission staff report included the following description and a figure (Attachment 1) of the existing Santa Barbara County pipeline network in 2004:

- All American Pipeline (AAPL) was built in the late 1980s. The pipeline runs from the South Coast to Kern County, where it connects to common carrier and proprietary lines to refining centers in the Los Angeles and San Francisco Bay areas. It began operating as a common carrier in 1991 immediately before offshore production began the rapid rise to its 1995 peak. AAPL soon became the backbone of South Coast oil transportation system, carrying all the oil

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<sup>1</sup> [http://www.countyofsb.org/energy/documents/policies/04\\_09-22PC%20Staff%20Report.pdf](http://www.countyofsb.org/energy/documents/policies/04_09-22PC%20Staff%20Report.pdf)

produced from Point Arguello project and ExxonMobil's consolidated processing facility at Las Flores Canyon.

- The Sisquoc Pipeline began operating in 1992. It is a common carrier pipeline which connects AAPL with the Point Pedernales pipeline (ConocoPhillips Line 300), running north to the Santa Maria upgrader refinery in San Luis Obispo County, and then on to the Rodeo and Avon refineries in the San Francisco Bay area.
- Pacific Pipeline began operating in 1999 as a common-carrier designed to carry heavy crude from Kern County to Los Angeles refineries.
- In addition to the new pipelines, several pipelines that were proprietary (or common carrier serving a single operator) in 1984 now operate as common carriers. These include the ConocoPhillips northern lines, ConocoPhillips and Shell lines southbound from Ventura, and Pacific Line 63 southbound from Kern County.

In addition to pipelines that transport crude oil (e.g., unprocessed oil) and refined products (e.g., gasoline, jet fuel, home heating oil, and diesel fuel) across the Central Coast Region, there are numerous pipelines that transport oil within oil fields that operate in the region. These pipelines connect individual oil wells to storage tanks and other oil field facilities. Major active oil fields in the Central Coast Region include the San Ardo, Arroyo Grande, Santa Maria Valley, Russell Ranch, South Cuyama, Cat Canyon, Orcutt, Casmalia, Lompoc, Ellwood, and Summerland Fields. Locations of oil fields in the Central Coast Region are shown on the map in Attachment 2. Additional pipeline, oil field, and associated facilities that are now decommissioned include the Guadalupe Oil Field, Avila Tank Farm, and the former Unocal Tank Farm on Tank Farm Road in San Luis Obispo.

## **REGULATION OF OIL PIPELINES**

### **Current Federal Regulations for Active Pipelines**

The Department of Transportation (DOT) is the primary regulatory agency for the operation of both oil and natural gas pipelines. Within DOT, the Pipeline and Hazardous Material Safety Administration (PHMSA), through the Federal Office of Pipeline Safety (OPS), administers the national regulatory program to assure safe transportation of natural gas, petroleum (oil), and other hazardous materials by pipeline. State Pipeline Safety programs (administered by State Fire Marshal) adopt the federal regulations and may issue more stringent regulations for intrastate pipeline operators under state law. The regulations are published in the Code of Federal Regulations, 49 CFR Parts 195-199.

During the peak period of pipeline construction (1960s), several states, counties, and municipalities adopted regulations for liquid pipelines in their areas. Because of local conflicting or inconsistent regulations, the pipeline industry appeared before the Senate in 1964 to request a single federal regulation. In 1967, the Federal Code of Regulations added new regulations for the design, construction, maintenance, and

operations of liquid pipelines. The authority to oversee these regulations was given to the DOT. In 1972, the Secretary of Transportation delegated the authority for oversight over liquid pipelines to the OPS. In 1981, the California State Fire Marshall became the acting agent for OPS to ensure compliance with federal and state pipeline regulations. In 2004, the PHMSA was created to provide a more focused research organization and establish a separate operating administration for the federal government.

### **Current California Regulations for Active Pipelines**

Since 1981, the California State Fire Marshal regulates the safety and operation of approximately 5,500 miles of active intrastate hazardous liquid transportation pipelines and acts as an agent of the Federal Office of Pipeline Safety concerning the inspection of more than 2,000 miles of interstate pipelines. The California State Fire Marshal staff inspects, tests, and investigates to ensure compliance with all federal and state laws (California Code of Regulations Sections 51010 to 51019).

The California Division of Oil, Gas, and Geothermal Resources (DOGGR) has regulatory authority over all oil, gas, and geothermal exploration and production operations in the State. As a part of this authority, DOGGR has responsibility for regulating flowlines, gathering lines, and other in-field pipelines used to transport crude oil, natural gas, and other fluids. DOGGR's pipeline jurisdiction ends at the administrative boundary of an oil field, which is usually the point where ownership of oil or gas is transferred to a pipeline company or oil shipper.

### **Environmental Oversight of Discharges from Pipelines**

The Regional Water Quality Control Boards, California Department of Fish and Game Office of Spill Prevention and Response, and other local agencies (e.g., County Environmental Health Departments, County Fire Departments) typically provide regulatory oversight on pipelines only following a discharge. Historic releases from pipelines are usually identified during the course of underground utility work or other subsurface construction activities near former pipelines, or when they are exposed through erosion. When a business, state agency, or individual discovers evidence of a leak from a pipeline (including an abandoned pipeline), they are required by law to report the leak to the California Emergency Management Agency (Cal EMA). Cal EMA serves as the central point in state government for the reporting of spills, unauthorized releases, or other accidental releases and coordinates the notification of the appropriate state and local administering agencies that may be required to respond to those spills and, unauthorized or accidental releases. Typically, the State Fire Marshall and local fire department respond to leaks from active pipelines until the immediate threat to life is mitigated. However, historic leaks and leaks from inactive pipelines are typically handled by local county agencies (for soil-only impacts), while Water Boards respond to spills that involve or potentially involve surface water and/or groundwater, and Fish and Game's Office of Spill Prevention and Response responds when there is a threat to aquatic habitat and wildlife.

## **INVESTIGATION AND CLEANUP OF OIL PIPELINE RELEASE SITES IN THE CENTRAL COAST REGION**

The Central Coast Water Board oversees pipeline sites where waste has, or reasonably could have impaired water quality. The local county agency (i.e., county health agency, county fire, etc.) typically oversees cleanup at release sites where only soil is impacted by waste. At more complex sites, Central Coast Water Board staff works with other local and state agencies to ensure appropriate technical review, permitting of cleanup activities, and ensure cleanup goals are met. In addition, some pipeline operators have pro-actively performed, or are currently performing, assessment and investigation of inactive pipelines. We provide a summary of these investigations below.

### **Central Coast Water Board-Lead Pipeline Discharge Sites**

Central Coast Water Board staff currently provides oversight on 31 oil pipeline release sites along major transmission lines, at oil storage and transport facilities, and within oil fields. This includes 16 cleanup cases that are located along the Union Oil's original pipeline right-of-way used to transport crude oil from oilfields in the San Joaquin Valley to the former Santa Maria refinery (now owned and operated by ConocoPhillips) on the Nipomo Mesa. Attachment 3, Table 1 lists active oil-related cleanup sites under the jurisdiction of the Central Coast Water Board.

Due to the viscosity of the crude oil and crude oil's tendency to adhere to soil particles, the lateral and vertical extent of pollution from pipeline discharges is typically limited and localized, although refined product (i.e., gasoline, diesel, distillate, etc.) leaks tend to spread more readily. Evaluation of crude oil pipeline discharges within the region confirms the limited extent of hydrocarbon migration. Recent Water Board staff inquiries with oil companies and local agencies corroborate these observations. Refined product pipeline discharges, although much less frequent, can pose a significant threat to surface and groundwater resources, due to both lower viscosity and higher toxicity relative to crude oil.

Crude oil pipeline discharges rarely pose a threat to groundwater supply wells, based on historic cleanup cases. To date, Central Coast Water Board staff is not aware of any water supply well impacts from these sites. However, these discharges can pose significant threat to surface water. ConocoPhillips observed impacts to surface water at the Tassajara Creek pipeline site, and performed remedial actions including capping two seeps with a three-inch layer of Gunitite<sup>®</sup> at that location in 1998. ConocoPhillips will perform additional remediation work (i.e., additional capping) at Tassajara Creek to remedy seepage (droplets and sheen, last observed July 2011). The California Department of Fish & Game assisted and advised Central Coast Water Board staff in all phases of assessment and remediation on this site. ConocoPhillips' consultant, Stantech Consulting, inspects Tassajara Creek quarterly and submits reports to the Central Coast Water Board.



**Site Prioritization Based on Threat**

In addition to pipeline discharge sites, the Central Coast Water Board's Site Cleanup Program staff addresses groundwater cleanups for spill sites that include industrial and chemical manufacturing, metal plating, former dry cleaners, and oil refining. This program currently has more sites than we have staff capacity to work on them. As a result, we must prioritize our sites to stay focused on the most important sites, those that pose the greatest risks to human health (i.e., inhalation and drinking water exposure) and water quality. Attachment 3, Table 1 provides a list of the active pipeline cleanup sites regulated by the Central Coast Water Board, along with the site's ranking based on risk criteria (described in the next paragraph).

Our primary goal through these prioritization efforts is to identify our highest priority sites, such that we can focus our limited resources on reducing the risk at these sites. Success in risk reduction efforts ultimately makes these cleanup sites lower priority cases. We rank all of our sites based on the following criteria: 1) risk to human health and the environment, 2) site hydrogeologic and waste complexity, and 3) level of public participation. Using these criteria, each site is ranked high, medium, or low priority. Based on the number of sites we have, staff typically spends 90 percent of their time on high and medium priority sites with the majority of staff's time being focused on reducing health and environmental risk for the high priority sites. Of the pipeline release sites we oversee, two rank as high priority sites (Guadalupe Oil Field, Avila Tank Farm), three are medium priority (Nipomo Creek Pipeline, Tassajara Creek, Tract 1259), and the remaining sites are low priority and not currently worked on due to the absence of a threat to human health and low threat to water quality. We will continue to evaluate pipeline release sites relative to other groundwater cleanup sites, both as new sites become known, and as we reduce risk at existing sites, to re-establish and focus on our highest priorities. At present, most of the existing pipeline sites are lower risk and therefore lower priority.

**Responses to Site-Specific Questions**

Your July 20, 2011 correspondence specifically inquired about the Nipomo Creek Pipeline cleanup site. In 2003, ConocoPhillips discovered that a section of abandoned pipeline located adjacent to Nipomo Creek near the Dana Adobe had leaked at some unknown date. ConocoPhillips discovered the discharge during replacement of a currently active section of pipeline that runs adjacent to the abandoned section. Recently, ConocoPhillips conducted a major cleanup action in Nipomo Creek, under requirements issued by the Central Coast Water Board's Executive Officer. The cleanup was necessary due to potential stream erosion exposing hydrocarbon-impacted soil beneath the creek. ConocoPhillips removed much of the pollution beneath the creek bed by excavation in October and November of 2011 and placed an impermeable barrier over remaining pollution to prevent future impacts to the creek. The impermeable barrier (Armorflex<sup>®</sup>) consists of an interlocking matrix of concrete blocks connected by a series of cables that was packed with, and capped with native

soil<sup>2</sup>. Following restoration of the creek banks, this remedial effort will be complete. Prior to the remediation activities, Central Coast Water Board staff inspected the area along the pipeline alignment in Nipomo from Tefft Street to the Dana Adobe (covering approximately 3 miles, including the pipeline section referenced in your letter) in June 2009, including the creek bed and banks of Nipomo Creek, and found no seepage or other surface evidence of crude oil releases along this section of the pipeline. Central Coast Water Board staff directed ConocoPhillips to clean up this crude oil release due to potential stream erosion exposing hydrocarbon-impacted soil beneath Nipomo Creek.

The subsequent cleanup activities at the Nipomo Creek site were successful and Central Coast Water Board staff would like to acknowledge all the hard work by other parties. For example, the excavation at the Nipomo Creek site required co-operation from the landowners and other stakeholders such as local Native Americans, and required numerous permits from other agencies including California Department of Fish and Game, Army Corps of Engineers, U.S. Fish and Wildlife Service, and San Luis Obispo County Planning and Building. Acquiring the necessary access agreements and permits for the project took over one year and all parties understood the urgency for the remediation project and fast-tracked reviews of the permit applications. Had the project been slightly larger in scope, a full California Environmental Quality Act (CEQA) assessment (environmental impact report) would have been required. The excavation work also temporarily caused a major impact to riparian habitat as seen in the following photograph taken on November 10, 2011. However, the cleanup was successful and site restoration is in progress.

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<sup>2</sup> See the May 21, 2010 Corrective Action Plan for the Nipomo Creek Pipeline located at [https://geotracker.waterboards.ca.gov/esi/uploads/geo\\_report/4967561125/SL0607907605.PDF](https://geotracker.waterboards.ca.gov/esi/uploads/geo_report/4967561125/SL0607907605.PDF)



To date, Central Coast Water Board staff has successfully closed ten oil pipeline release sites. These sites are listed in Table 2 of Attachment 3. One of these closed sites is the Avila Beach main plume site. A series of oil pipelines beneath Front Street in Avila Beach at various times discharged diesel, crude oil, and gasoline during a period from approximately 1940 until 1996. The Central Coast Water Board directed Unocal to clean up the primary Front Street plume in an excavation project that lasted from 1998 until 2000. Additionally, Central Coast Water Board staff continues with cleanup work on the Guadalupe site, continuing more than a decade worth of excavation projects and other remediation efforts at this location. Between the mid-1950s and 1994, Unocal-owned pipelines and tanks leaked an estimated 18 million gallons of diluent (a petroleum derivative pumped into heavy crude oil fields to make the oil flow with lower viscosity) under the Guadalupe-Nipomo Dunes and the adjacent ocean front. For scale, this release is approximately three times larger than the Santa Barbara Channel oil spill in 1969. Since the mid-1990s, Central Coast Water Board staff has directed Unocal/Chevron to actively clean up the various portions of the site that pose risk to surface water and groundwater. As part of the cleanup, Unocal/Chevron has done extensive habitat restoration and received praise from the Sierra Club, among others, for their efforts. Central Coast Water Board staff has overseen the excavation of 25 impacted areas at the Guadalupe Oil Field and continues to work with Chevron to address water quality issues at this site. Central Coast Water Board staff has also enforced requirements for excavation work at the former Chevron Estero facility and in several additional locations in Avila Beach. We will continue to work on priority oil-related sites to ensure human health and the environment are protected, and continue moving these sites to closure.



In your letter, you asked, "At this Nipomo Creek segment, we would think the line could be pulled up for inspection with minimal impact to riparian habitat or other CEQA concerns. Can the Water Board order such an action? And would a Final Clean-Up Agreement on the Nipomo Creek spill that did not so stipulate preclude it from doing so?"

Based on knowledge from the existing Nipomo Creek cleanup project, an effort on the scale suggested in your comments would likely trigger an Environmental Impact Report, although we recommend that you inquire with the San Luis Obispo County Planning Department staff for a more definitive answer, as a project of this scope would span the authorities of numerous agencies, the Central Coast Water Board being only one. The Central Coast Water Board has the authority to require cleanup and abatement of discharges that impact, threaten, or have the potential to threaten surface water or groundwater. Removal of pipelines, where they meet these conditions of impacting or threatening to impact water quality, is one of many potential strategies for abating discharges or threatened discharges, however Water Board authority is limited in specifying exact methods for cleanup. A "Final Clean-Up Agreement", assuming this refers to a Corrective Action Plan, if effective, will remediate the threat to water quality, making further action (i.e., pipeline removal) unnecessary. However, as with any cleanup site, if implementation of the Corrective Action Plan proves inadequate, further cleanup action will likely be required.

### **County and City-Lead Pipeline Discharge Sites**

County departments typically oversee cleanup of oil-related, soil-only cases. For example, the Santa Barbara County Fire Department oversees approximately 123 active cleanup sites and has closed approximately 112 sites through their Oilfield Decommissioning Program. The County of San Luis Obispo Environmental Health Department closed approximately seven cases and is still actively working on approximately five pipeline-related, soil-only release sites. Monterey County Environmental Health Department confirmed working on only one pipeline-related case. Although these sites are soil-only cases, when these agencies discover potential water quality issues, the case is referred to the Central Coast Water Board (e.g., Nipomo Creek site).

### **Inactive and Decommissioned Oil Pipeline Investigations by Pipeline Operators**

As part of developing responses to your comments and those of the Central Coast Water Board members from the September 1, 2011 meeting, Central Coast Water Board staff contacted two major oil pipeline operators working within the Central Coast Region. ConocoPhillips and Chevron Environmental Management Company representatives informed Central Coast Water Board staff that both companies have programs that determine locations of old abandoned pipelines, investigate potential releases from abandoned pipelines, and implement remediation plans to put the pipelines in a condition that is safe for the environment. ConocoPhillips currently implements a program in Kern County and plans to expand the program to San Luis Obispo County in 2012. Chevron representatives indicated that they have completed

investigations of some inactive and decommissioned pipelines in the Central Coast region for which they are responsible. Chevron activities include: 1) cataloguing the inactive pipelines for which they are responsible, 2) conducting field assessments of those pipelines to determine if they still contain liquids, and 3) removing or leaving the abandoned pipelines in a condition that is safe for the environment.

### **FURTHER ASSESSMENT OF POTENTIAL INACTIVE/ABANDONED PIPELINE RELEASES**

To better understand the location and potential environmental risk associated with oil pipelines in the region, Central Coast Water Board staff communicated with operators of active and inactive/abandoned oil pipelines, State Fire Marshal, and other local agencies. Central Coast Water Board staff plans to issue requests for information from all major pipeline operators/owners (both active and inactive/abandoned) in the Central Coast Region to gather information on any pipeline assessment work completed to date to help us determine if previously unknown potential threats to human health and water quality exist from inactive and abandoned pipelines. Central Coast Water Boards staff will also continue to obtain information from State Fire Marshal and other state and local agencies to determine what actions these agencies take and what available information these agencies have on abandoned pipelines in our region. We will use this information to:

- Identify additional locations of inactive/abandoned pipelines,
- Determine existing leak environmental evaluation and response protocols,
- Identify any information from these environmental evaluations showing potential threats to human health and/or the environment,
- Evaluate potential methods for assessing/predicting possible historical release locations from pipelines, and assessing the feasibility of removing or appropriately abandoning sections of inactive pipelines,
- Evaluate/implement appropriate pipeline abandonment methods for inactive/abandoned pipelines, and
- Determine whether further investigation of these pipelines is warranted, based on the priority of each of these individual sites relative to other existing cleanup cases.

Central Coast Water Board staff discussions with pipeline operators and owners will continue, along with associated assessment and cleanup actions. We will also prepare an item for the Executive Officer's Report for the March 15, 2012 Central Coast Water Board meeting in San Luis Obispo. This report will provide the information included in this letter, along with a summary of the subsequent findings and next steps, which may include requiring additional assessment work, if such work is determined to be feasible and warranted, with relation to our overall organizational priorities as presented at our July 14, 2012 Water Board meeting

([http://www.swrcb.ca.gov/rwgcb3/board\\_info/agendas/2011/July/Item\\_18/18\\_att1.pdf](http://www.swrcb.ca.gov/rwgcb3/board_info/agendas/2011/July/Item_18/18_att1.pdf)) and as discussed briefly above.

**CONCLUSION**

Central Coast Water Board staff appreciates and shares your concern about potential water quality impacts from hydrocarbon pipelines in the Central Coast Region. The Central Coast Water Board has spent considerable staff resources towards the cleanup of priority oil discharges, and will continue to require assessment and cleanup at known high priority pipeline release sites. Staff will also continue assessing whether the threat to water quality posed by active and abandoned pipelines warrants additional investigation, pipeline removal, and/or cleanup actions on a site-by-site basis. The Sierra Club Santa Lucia Chapter has been added to our list of interested parties for the Nipomo Creek site and will also be notified of any future reports presented to our Board relating to hydrocarbon pipeline issues.

Thank you, Andrew, for your letter, questions, and commitment to protecting water quality. If you have further questions, please contact **Rich Chandler at (805) 542-4627**, Thea Tryon at (805) 542-4776, or John Robertson at (805) 542-4630.

Sincerely,

for Roger W. Briggs  
Executive Officer

Attachment 1: Map of Oil Pipelines in the Central Coast Region, from September 22, 2004 Santa Barbara County Planning Commission staff report

Attachment 2: Locations of Oil Fields in the Central Coast Region

Attachment 3: Summary Tables for Active and Closed Central Coast Water Board Oil Pipeline Cleanup Sites

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cc:

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<p>Ms. Sandra Burkhart Western States Petroleum Association P.O. Box 21108 Santa Barbara, California 93121</p>	<p>Mr. Frank Cummings Aera Energy 10000 Ming Avenue Bakersfield, CA 93311</p>

Mr. Troy Haudeberg Chevron Pipe Line Company 16301 Trojan Way La Mirada, CA 90638	Mr. Brian Gibbs ConocoPhillips 3900 Kilroy Airport Way #210 Long Beach, CA 90806
Mr. Dan Fischman ConocoPhillips 3900 Kilroy Airport Way #210 Long Beach, CA 90806	Mr. Larry Alexander Crimson Pipeline LP 2459 Redondo Avenue Long Beach, CA 90755
Mr. Don Quinn Kinder Morgan 1100 Town & Country Road Orange, CA 92868	Mr. Bruce Johnston Pacific Operators Offshore LLC 1145 Eugenia Place #200 Carpinteria, CA 93013
Mr. Robert Marsalek Plains Exploration & Production 201 South Broadway Orcutt, CA 93455	Mr. Ronald Klarc Rincon Island LP 5750 West Pacific Coast Highway Ventura, CA 93001
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# Attachment I Map of Oil Pipelines in the Central Coast Region

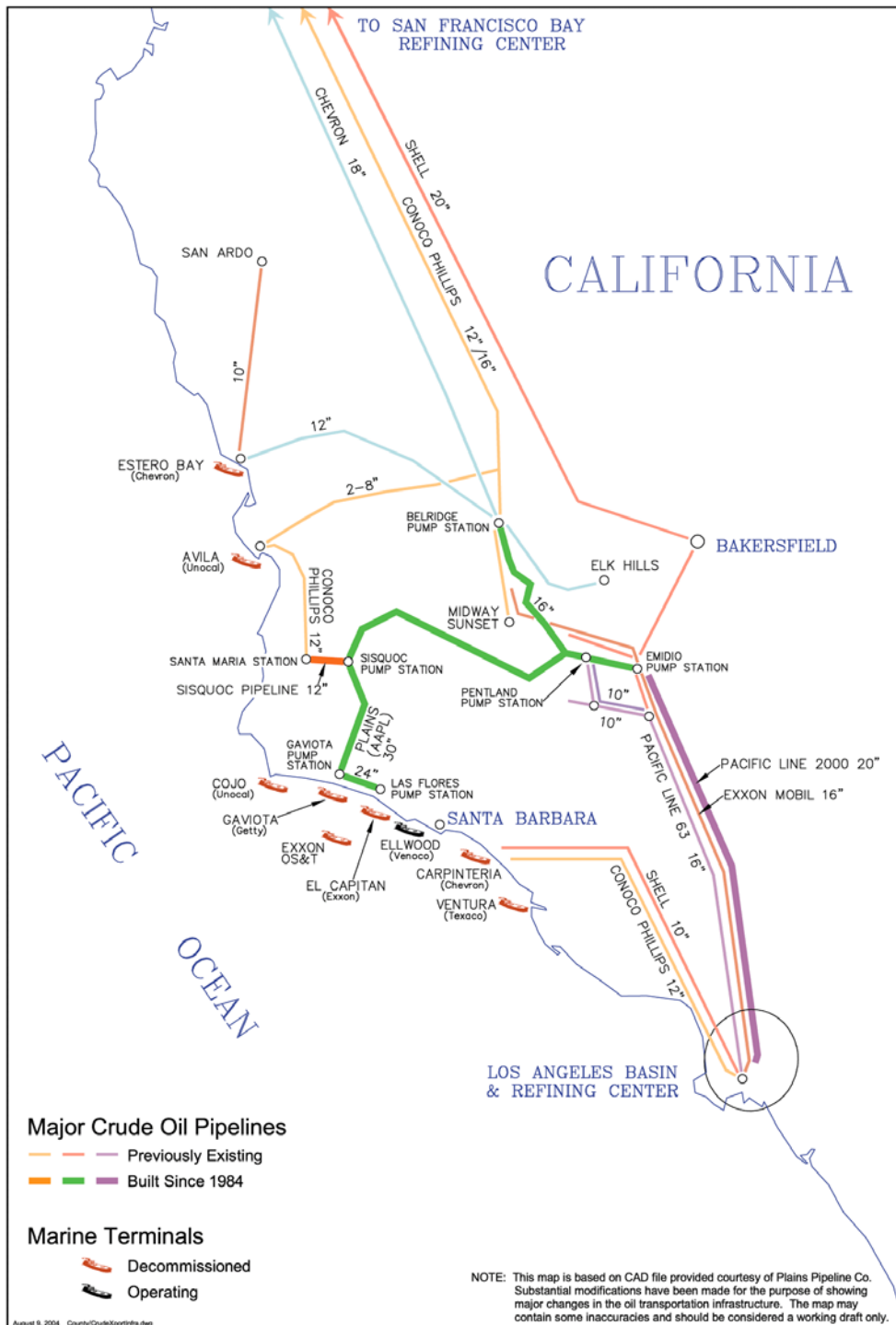
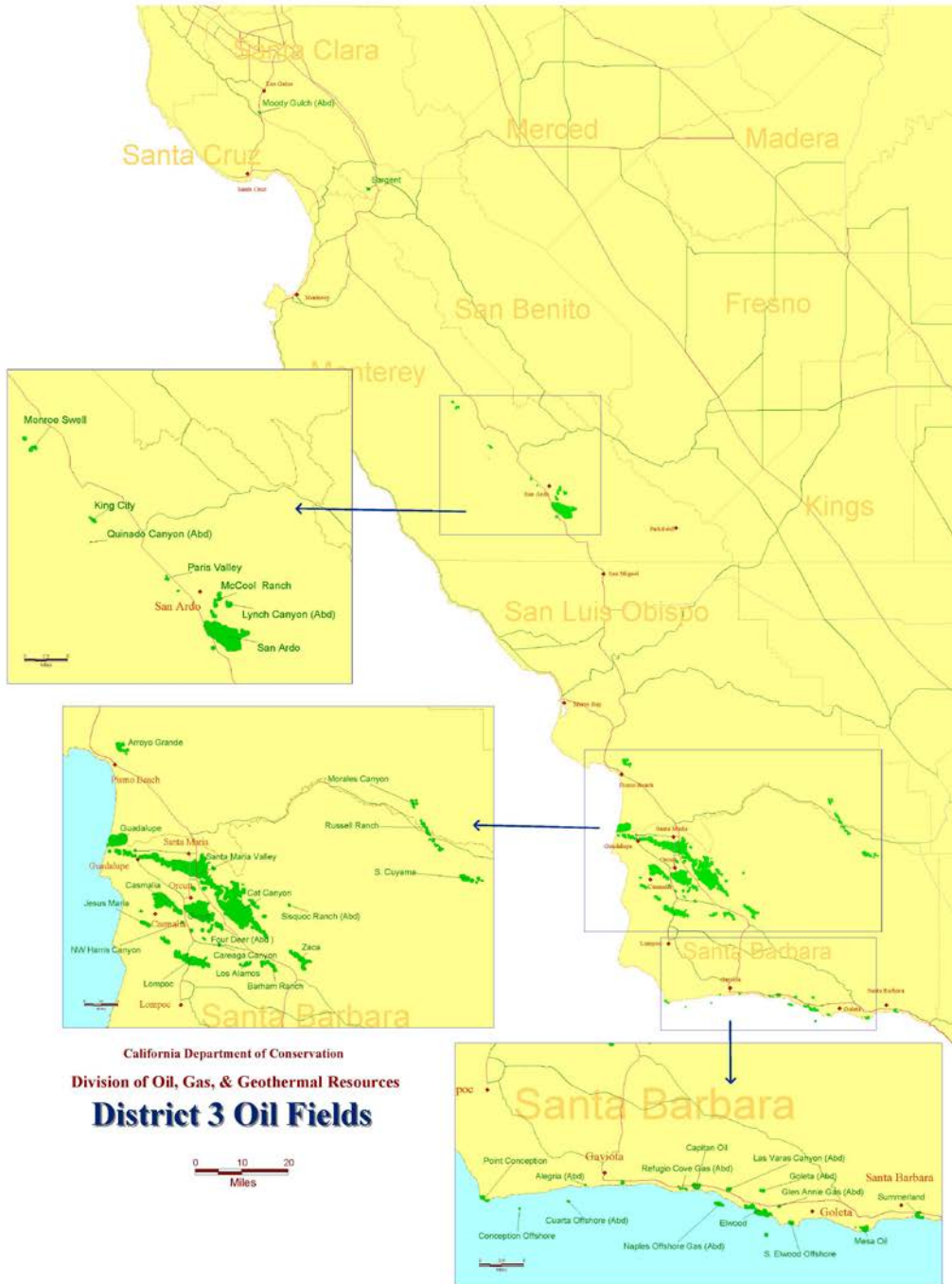


Figure 1. Crude Oil Transportation Infrastructure -- Changes 1984-2004.

Three new pipelines (shown in broad lines) facilitate transport of crude oil from Santa Barbara to refineries: Plains Pipeline (formerly AAPL); Pacific Line 2000; and the Sisquoc Pipeline interconnect. A number of marine terminals have been decommissioned in the Tri-County area while one remains in operation at Ellwood.



Attachment 2 – Locations of Oil Fields in the Central Coast Region



Attachment 3 – Summary Tables of Oil Pipeline Cleanup Sites

**TABLE 1:  
ACTIVE OIL PIPELINE CLEANUP SITES  
WITHIN THE CENTRAL COAST REGION**

<b>SITE NAME</b>	<b>CURRENT OWNER</b>	<b>ADDRESS</b>	<b>CITY</b>	<b>COUNTY</b>	<b>PIPELINE</b>	<b>PRIORITY<sup>1</sup></b>
Avila Beach East of San Luis Obispo Creek	Chevron	1238 Avila Beach Drive	Avila Beach	San Luis Obispo	Pipeline associated with Marine Terminal	Low*
Avila Beach Pier	Chevron	450 Front Street	Avila Beach	San Luis Obispo	Pipeline associated with Marine Terminal	Low
Avila Tank Farm	Chevron	10 San Rafael Street	Avila Beach	San Luis Obispo	Pipeline associated with Marine Terminal	High
ConocoPhillips (Former TOSCO/UNOCAL) Refinery, Santa Maria Facility	ConocoPhillips	2555 Willow Road	Arroyo Grande	San Luis Obispo	Pipeline associated with Tanks at Refinery	Low*
COP Pipeline at Call Canyon	Chevron	Highway 101	San Luis Obispo	San Luis Obispo	ConocoPhillips Pipeline	Low*
COP Pipeline at Gularte Canyon	Chevron	Old US 101 North	San Luis Obispo	San Luis Obispo	ConocoPhillips Pipeline	Low*
COP Pipeline at Highway 46	Chevron	Highway 46	Cholame	San Luis Obispo	ConocoPhillips Pipeline	Low*
COP Pipeline at San Luis Drive	Chevron	San Luis Drive	San Luis Obispo	San Luis Obispo	ConocoPhillips Pipeline	Low*
COP Pipeline at Tassajara Creek	Chevron	East Bank of Santa Margarita Creek	Santa Margarita	San Luis Obispo	ConocoPhillips Pipeline	Medium
ConocoPhillips RM&R site 05109	ConocoPhillips	US 101 at CA 58	Santa Margarita	San Luis Obispo	ConocoPhillips Pipeline	Low*
ConocoPhillips site # 3469	ConocoPhillips	Lucy Brown Road	Shandon	San Luis Obispo	ConocoPhillips Pipeline	Low*

<b>SITE NAME</b>	<b>CURRENT OWNER</b>	<b>ADDRESS</b>	<b>CITY</b>	<b>COUNTY</b>	<b>PIPELINE</b>	<b>PRIORITY<sup>1</sup></b>
Estero Bay Chevron Marine Terminal	Chevron	4000 HWY 1	Morro Bay	San Luis Obispo	Pipelines associated with Marine Terminal	Low*
Former UNOCAL (now Chevron) Government Point Production Facility	Chevron	1000 Cojo Bay Road	Gaviota	Santa Barbara	Pipelines associated with Tank Battery	Low*
Nipomo Creek Pipeline, Line 300 (RM&R SITE NO. 3788)	ConocoPhillips	671 Oakglen Avenue	Nipomo	San Luis Obispo	ConocoPhillips Pipeline	Medium
Pipeline- Santa Margarita to Tassajara Creek	ConocoPhillips	0 El Camino Real to Tassajara Creek Road	Santa Margarita	San Luis Obispo	ConocoPhillips Pipeline	Low*
Pismo Street & Morro Street Pipeline Release	ConocoPhillips	900 Pismo Street	San Luis Obispo	San Luis Obispo	ConocoPhillips Pipeline	Low*
Polonio Pass Pipeline	ConocoPhillips	0 Highway 46	Cholame	San Luis Obispo	ConocoPhillips Pipeline	Low*
PXP pipeline	Plains Exploration & Production	1 VAFB base and adjacent	Lompoc	Santa Barbara	PXP Pipeline	Low*
Santa Margarita Pump Station (ConocoPhillips)	ConocoPhillips	0 El Camino Real, North of Santa Margarita	Santa Margarita	San Luis Obispo	ConocoPhillips Pipeline	Low*
Santa Maria Refining Company - Asphalt Refinery	Greka	1660 Sinton Road	Santa Maria	Santa Barbara	Pipelines associated with Refinery	Low*
Shell California Lease (Cat Canyon Oilfield)	Shell Exploration & Production Company	6527 Dominion Road	Santa Maria	Santa Barbara	Pipelines within Oilfield	Low*
Shell United California Lease (Cat Canyon Oilfield)	Shell Exploration & Production Company	6527 Dominion Road	Santa Maria	Santa Barbara	Pipelines within Oilfield	Low*

SITE NAME	CURRENT OWNER	ADDRESS	CITY	COUNTY	PIPELINE	PRIORITY <sup>1</sup>
Tract 1259	Chevron	0 San Luis Drive	San Luis Obispo	San Luis Obispo	ConocoPhillips Pipeline	Medium
UNOCAL - Guadalupe Oilfield	Chevron	2184 Thornberry Road	Guadalupe	San Luis Obispo	Pipelines within Oilfield	High
UNOCAL - Pipeline - Tank Farm Road	Chevron	Tank Farm Road	San Luis Obispo	San Luis Obispo	Pipelines associated with Tank Battery	Low*
UNOCAL - Tank Farm Road - Bulk Storage	Chevron	276 Tank Farm Road	San Luis Obispo	San Luis Obispo	Pipelines associated with Tank Battery	Low*
UNOCAL - Guadalupe Beach Park Area	Thriftway	0 West end of Main Street	Guadalupe	Santa Barbara	Oil well/sump	Low*
UNOCAL - Old Pipeline No. 2	Chevron	4325 S. Higuera Street	San Luis Obispo	San Luis Obispo	ConocoPhillips Pipeline	Low*
UNOCAL - Elks Lane Pipeline	Chevron	0 Elks Lane	San Luis Obispo	San Luis Obispo	ConocoPhillips Pipeline	Low*
Vintage United California Lease - Bradley Canyon	Glenn Springs Holding, Inc.	6527 Dominion Road	Santa Maria	Santa Barbara	Pipeline within Oilfield	Low*
ConocoPhillips site # 4988	ConocoPhillips	Pismo street @ Higuera street	San Luis Obispo	San Luis Obispo	ConocoPhillips Pipeline	Low*

Notes:

1 Central Coast Water Board staff's internal prioritization scores rank sites high, medium, or low priority based on risk to human health and environment, site and waste complexity, and public participation.

\*The sites that are scored "Low" represent sites that are very low in risk and are ready to close.

Attachment 3 – Summary Tables of Oil Pipeline Sites, continued

**TABLE 2  
CLOSED OIL PIPELINE CLEANUP SITES  
WITHIN THE CENTRAL COAST REGION**

<b>SITE NAME</b>	<b>ADDRESS</b>	<b>CITY</b>	<b>COUNTY</b>
Avila Beach West of San Luis Obispo Creek	3223 Avila Beach Drive	Avila Beach	San Luis Obispo
Cowan (former Serafino-Martinelli) Prop	East Prado Road	San Luis Obispo	San Luis Obispo
Former Martinelli Property	Prado Road	San Luis Obispo	San Luis Obispo
Mobil Estero Martine Terminal	4000 Highway 1	Morro Bay	San Luis Obispo
Thriftway Co. Main St. Well Site	Main St and the Pacific Ocean	Guadalupe	Santa Barbara
Unocal - Avila Beach Main Plume	1 Front St.	Avila Beach	San Luis Obispo
Unocal - Battles Gas Plant	1350 East Battles Road	Santa Maria	Santa Barbara
Unocal Gross Property Fleischer Lease	2951 Wildhaven Circle	Santa Maria	Santa Barbara
Unocal Leroy-Ferrari Lease	Main St.	Guadalupe	Santa Barbara
Unocal Signal-Bradley Lease	South of Betteravia	Santa Maria	Santa Barbara