

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion to Adopt
New Safety and Reliability Regulations
for Natural Gas Transmission and
Distribution Pipelines and Related
Ratemaking Mechanisms.

Rulemaking 11-02-019
(Filed February 24, 2011)

**SAFETY AND ENFORCEMENT DIVISION'S
REQUEST FOR OFFICIAL NOTICE**

Pursuant to Rule 13.9 of the Commission's Rules of Practice and Procedure, Safety and Enforcement Division ("SED") requests that the Commission take official notice of the documents attached as Exhibits 1 through 4. Official notice is sought, not to establish a material fact relevant to the merits of the alleged violations in these proceedings, but to show the circumstances of I.11-02-016, a separate but related penalty proceeding before the Commission.¹ These four exhibits are already part of the record in I.11-02-016. True and correct copies of the documents for which SED requests official notice are attached.

Exhibit 1: PG&E's Data Responses to SED Data Request 24, Question 2, which is part of the record of I.11-02-016, the Commission's Recordkeeping investigation.

Exhibit 2: A letter dated January 31, 2013 from PG&E President Chris Johns, addressed to National Transportation Safety Board Chairman Deborah Hersman.

¹ See Verified Statement of Pacific Gas and Electric Company's Vice President of Gas Transmission Maintenance and Construction in Response to Ruling of Assigned Commissioner and Assigned Administrative Law Judge, Page 8, Paragraph 29.

Exhibit 3: I.11-02-016, PG&E Exhibit 61, “Pacific gas and Electric Company’s Response to the Consumer Protection and Safety Division’s Reports: Records Management Within the Gas transmission Division of PG&E Prior to the Natural Gas Transmission Pipeline Rupture and Fire, San Bruno, California, September 9, 2010 and Report and Testimony of Margaret Felts Testimony of Witnesses”, Chapter 3, Page 3-32.

Exhibit 4: I.11-02-016, Excerpt of PG&E Data Response to Joint TURN and CPSD Data Request 01Q02_Atch01.

Under Rule 13.9 of the Commission’s Rules of Practice and Procedure, the Commission may take official notice of “such matters as may be judicially noticed by the courts of the State of California pursuant to Evidence Code section 450 *et seq.*”

In determining whether it may properly take judicial notice of facts, a court may resort to “[a]ny source of pertinent information.” Evid. Code § 454. Section 452 provides that it is appropriate for a court to take judicial notice of official acts of the legislative, executive, and judicial departments of the United States and of any state of the United States. Evid. Code § 452(c).

It is also proper to take judicial notice of records of any court of this state, the United States, or any other states, as well as “[f]acts and propositions that are not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy.” Evid. Code § 452(d) & (h). Section 453 provides that granting a request under Section 452 is mandatory where the requesting party: (1) gives sufficient notice to adverse parties, through the pleadings or otherwise; and (2) includes sufficient information to enable the court to take judicial notice. Evid. Code § 453.

Official notice of the requested documents is proper here for the following reasons:

Exhibit 1 is PG&E's data responses to SED data requests about PG&E's limited knowledge of the existence of re-conditioned pipe in its system. Exhibit 3 is a statement by PG&E about its limited knowledge of the existence of re-conditioned pipe in its system. Both of these data responses contain pertinent factual background about PG&E's significant lack of knowledge of re-conditioned pipe in its system in another proceeding, but which is probative to SED's position in the Rulemaking's Order to Show Cause ("OSC").

Exhibit 2 is a letter from PG&E president Chris Johns to the National Transportation Safety Board Chairman. In this letter, PG&E states that

"PG&E has completed the determination of the valid maximum allowable operating pressure (MAOP), based on the weakest section of the pipeline or component. The purpose of the MAOP validation is to ensure safe operation of natural gas transmission lines in class 3 and class 4 locations and class 1 and class 2 high consequence areas (HCA) that have not had a MAOP established through prior hydrostatic testing."

This document shows that PG&E has notified the National Transportation Safety Board, which investigated the San Bruno explosion, that PG&E completed a specific part of its MAOP validation effort by January 31, 2013.

Exhibit 4 is a small excerpt of PG&E's data response to SED and TURN's joint data request. Among other things, this data response shows a small portion of more than 2,000 of PG&E's assumed SMYS values of higher than 24,000 psig. This data response contains pertinent factual background about PG&E's general knowledge of pipeline characteristics in its system in another proceeding.

Exhibits 1 through 4 are part of the record in Commission proceeding number I.11-02-016. As such, the Commission may take official notice of these documents under California Evidence Code §452. Moreover, in the current proceeding, each of these documents helps the Commission evaluate the veracity of the testimony of PG&E's Vice President of Gas Transmission, Maintenance, and Construction ("VP") that PG&E's

engineers have validated the engineering and construction through records review.² These same documents also help the Commission evaluate the veracity of the VP's conclusion that in his professional judgment, Lines 101, 132A, and 147 are safe to operate at 365 psig.³

For the reasons described above, SED respectfully requests that the Commission take official notice of Exhibits 1 through 4.

Respectfully submitted,

DARRYL J. GRUEN

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September 26, 2013

² Decision 11-12-048, P. 8.

³ *Id.*

EXHIBIT 1

DR ID#	24-2(b): Line Re- Install	24-2(b): Mile Points Re- install	24-2(b): Segment Numbers Re- install	24-2(c): Year Re-install	24-2(d): Age of reconditioned pipe based on manufacture date	Documents used to identify pipe as reconditioned	Any documents included in Legal Division's Oct 2011 Safety Evidence motion?	Notes
DR ID #1	101	n/a	n/a	1957	1949	MAOP05395308	MAOP05395308 is Document # 42 from the motion.	Casing pipe, not gas containing.
DR ID #2	101	32.96-33.7	167.2, 168	1949	unknown	93716_A0 Smith Docs_201109241302	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #3	101	33.7	169.26	1974	unknown	086275 (Sheet 10 of 24); 382387s1; MAOP10027196	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #4	107	32.46-33.20	166-166.6	1954	unknown	MAOP05439039; MAOP11062606	MAOP05439039 is Document #50 from the motion; MAOP05267252 is Document # 38 from the motion; and MAOP11062606 is Document # 75 from the motion. They are duplicate documents.	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #5	109	25.68-26.0	160.8, 161, 161.2, 161.3, 161.6, 161.8	1972	1947	MAOP05322285; See also: binder4_Page_071; MAOP05322186; MAOP05322187; MAOP05322259; MAOP05322260; MAOP05322446; MAOP05322504; MAOP05322505; MAOP05322506; MAOP06004806; MAOP06004807; MAOP09031278; MAOP09041324; MAOP16101688; MAOP10035148; binder4_Page_068; binder4_Page_067.	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #6	131	8.03-9.19	119	1955	unknown	0268_003; 384415s1; MAOP00594970; MAOP00594960	n/a	Planned for Pressure Test on 3/15/2012 as part of PSEP Phase 1

DR ID#	24-2(b): Line Re- Install	24-2(b): Mile Points Re- Install	24-2(b): Segment Numbers Re- Install	24-2(c): Year Re-Install	24-2(d): Age of reconditioned pipe based on manufacture date	Documents used to identify pipe as reconditioned	Any documents included in Legal Division's Oct 2011 Safety Evidence motion?	Notes
DR ID#7	132	4.0-4.29	1189, 118, 117.9, 117.8	1977	unknown	L132 recond pipe; (Similar to: MAOP04103156; MAOP06004953; MAOP06004969; MAOP00054148; MAOP06004954; MAOP06004970) MAOP00054165; MAOP00054166; MAOP00054167; Binder3_Page_074; MAOP00054169; MAOP00054170. IRIS: All Confirmed. Also, three more docs (MAOP06004955, 06004964 & 06004987) found in folder, but not included in this spreadsheet.	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID#8	132	15.10-15.61	145145.5	1957	1947	0269.067; MAOP04041000; MAOP05326875; MAOP05326802	MAOP05326875 is Document # 9 from the motion.	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID#9	150	16.87-17.22	117	1940	unknown	MAOP00670593; 381280s8; 381280s2; 381280s3; 081237; MAOP00670831; MAOP00670827	n/a	Planned for Pressure Test in 2013 as part of PSEP Phase 1

DR ID#	24-2(b): Line Re- Install	24-2(b): Mile Points Re- install	24-2(b): Segment Numbers Re- install	24-2(c): Year Re-install	24-2(d): Age of reconditioned pipe based on manufacture date	Documents used to identify pipe as reconditioned	Any documents included in Legal Division's Oct 2011 Safety Evidence motion?	Notes
DR ID #10	220	20.95-21.3	129	1940	unknown	MAOP00670593; MAOP00310076; 381660s7; 381660s8; 081237; MAOP00670595; MAOP00670577; MAOP00670914; MAOP11083176	n/a	Planned for Pressure Test in 2013 as part of PSEP Phase 1
DR ID #11	402	13.74-38.15	116- 130	1961	unknown	MAOP00264039; MAOP03025944; MAOP05314444	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #12	0126-01	0.14-1.76	101, 101.1	1965	unknown	2011030313583591_00001; MAOP08657338; MAOP10007260; MAOP08662596; MAOP10007576	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #13	118A	66.2-66.22 (new location per GIS)	221.5	1978	unknown	MAOP08003215; 381260s65	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #14	132A	0.131-0.145	101.5, 101.6, 101.7	1969	1936	MAOP06004471; MAOP06004372	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #15	1813-02	12.52-13.01	170.3	1966	unknown	MAOP00046832; MAOP0046833	n/a	Planned for Pressure Test in 2013 as part of Integrity Management Work

DR ID#	24-2(b): Line Re- Install	24-2(b): Mile Points Re- Install	24-2(b): Segment Re- Install	24-2(c): Year Re-Install	24-2(d): Age of reconditioned pipe based on manufacture date	Documents used to Identify pipe as reconditioned	Any documents included in Legal Division's Oct 2011 Safety Evidence motion?	Notes
DR ID #16	181B	3.72-4.54	107, 107.1, 107.2	1966	unknown	MAOP03145960; MAOP03145961; MAOP00904393; MAOP03145964; MAOP00904393	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #17	181B	5.85-8.42	109.1 to 112.1 (except 109.2)	1966	unknown	MAOP03146645; MAOP03146647; MAOP03146888; MAOP03146696; MAOP03146650; MAOP03146648; MAOP03147003; MAOP03147501; MAOP03147577; MAOP03147287; MAOP03147283 (dupe); MAOP03147281 (dupe);	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #18	301A	24.42-24.63	135, 135.5 (based on STPR sketch)	1973	unknown	MAOP06004715; MAOP08697280; MAOP08697237; MAOP08697258; MAOP08697325; MAOP08697232	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #19	301F	0.00 - 7.94 (not inclusive)	101 - 113 (not inclusive)	1965	1929	MAOP00488506; 0261.014; L301F 5; L301F 4; MAOP00486732; MAOP00488444 & MAOP00487972; MSOP00488035; 0028.007	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.

DR ID#	24-2(b): Line Re- Install	24-2(b): Mile Points Re- Install	24-2(b): Segment Numbers Re- Install	24-2(c): Year Re-Install	24-2(d): Age of reconditioned pipe based on manufacture date	Documents used to identify pipe as reconditioned	Any documents included in Legal Division's Oct 2011 Safety Evidence motion?	Notes
DR ID #20	301F	2.86	104.3 (confirmed with plan and GIS)	1969	unknown	MAOP00041461; MAOP00041517; 0028_009; MAOP03126142	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #21	301F	3.0700 - 3.0975	105.3	1969	unknown	MAOP00041461; MAOP00041517; 0028_009; MAOP03126142	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #22	SP3	195.85-195.89	152152.3	1983	unknown	MAOP10082467; MAOP03093308; MAOP10082514; MAOP03093206; MAOP10082506; MAOP03093141; MAOP00916700; MAOP00916718	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #23	SP3	197.95-198.06	158.9 -159.2	1966	unknown	2011031107583668_000015; 2011031107583668_000019; 386423s25; 2011031107583668_000007; 486939s2	n/a	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #24	X6535	0.01-0.13	503	1956	1949	MAOP05395309	MAOP05395309 is Document # 43 from the motion.	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.
DR ID #25	X6535	0.0-0.01	503	1956	1949	MAOP05395308	MAOP05395308 is Document # 42 from the motion.	Records reviewed as part of MAOP validation effort indicate pipe was strength tested.

**PACIFIC GAS AND ELECTRIC COMPANY
Gas Transmission System Records OII
Investigation 11-02-016
Data Response**

PG&E Data Request No.:	CPUC_024-02		
PG&E File Name:	GasTransmissionSystemRecordsOII_DR_CPUC_024-Q02		
Request Date:	November 10, 2011	Requester DR No.:	024
Date Sent:	January 31, 2012	Requesting Party:	California Public Utilities Commission
PG&E Witness:		Requester:	Bob Cagen



QUESTION 2

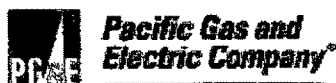
For every piece of re-conditioned pipe in the PG&E transmission system identified in PG&E's databases, provide a consolidated list that shows the following:

- a. The name of the data base showing the re-conditioned pipe. PG&E's Geographic Information System ("GIS") is an example of one type of data base.)
- b. The location of the re-conditioned pipe on the system according to the data base (Including Line number, segment, mile post and star/end coordinates)
- c. The year that the re-conditioned pipe was installed according to the data base.
- d. The age of the re-conditioned pipe according to (a) GIS and (b) any other secondary evidence (if so, please identify source and supply copies of the relevant records).
- e. Identify exactly which attributes were used in the database to identify the pipe as re-conditioned or if some other way was used to determine this. If other secondary evidence was used to identify the pipe as reconditioned please identify the source of this information and supply copies of the relevant records.

ANSWER 2

As noted in response to Data Request CPUC_024-Q01, PG&E has not previously captured data identifying reconditioned pipe in the gas transmission system in its databases. PG&E is currently collecting and cataloguing data identifying reconditioned pipe in the gas transmission system in the course of its ongoing effort to validate the MAOP of its gas transmission pipelines and to create detailed "pipeline features lists." Please see PG&E's response to Data Request CPUC_016-Q05, for further details on its data collection and cataloguing procedures for reconditioned pipe. A catalog of reconditioned pipe for the entire transmission system will be available at the conclusion of this effort, currently estimated to be completed by early 2013. To provide a substantive response to this question to the extent currently possible, PG&E is accessing the reconditioned pipe information it has collected and verified to date. The information that has been collected and verified through the beginning of January 2012 and that is responsive to Question 2(b) to (d) is provided in the attached chart. See GasTransmissionSystemRecordsOII_DR_CPUC_024-Q02Atch01. The documents that have been relied on to determine that a piece of pipe is reconditioned are also attached. For ease of reference, the documents are provided with their original document titles, instead of renamed as attachments. (The original titles are used in the attached chart.)

EXHIBIT 2



Christopher P. Johns
President

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San Francisco, CA 94105

Mailing Address
Mail Code B32
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San Francisco, CA 94177

415.973.7000

January 31, 2013

Honorable Deborah A. P. Hersman
National Transportation Safety Board
490 L'Enfant Plaza, SW
Washington, DC 20594

Re: NTSB Safety Recommendations Status Update

Dear Chairman Hersman:

Pacific Gas and Electric Company (PG&E) continues to make substantial progress implementing the safety recommendations outlined by the NTSB's investigation of the September 2010 San Bruno pipeline accident. This status report provides details on the actions we are taking to assure public safety remains the company's highest priority.

In 2012, the NTSB evaluated PG&E's progress and closed four recommendations:

1. P-10-2: Search for Records
2. P-11-3: 911 Notifications
3. P-11-25: Emergency Response Procedures
4. P-11-28: Toxicology Testing

In this report, we are submitting three additional recommendations for closure consideration by the NTSB:

1. P-10-3: MAOP Validation
2. P-11-24: Work Clearance Procedures
3. P-11-31: Public Awareness Program Continuous Improvement

For recommendation P-10-3 (MAOP Validation), PG&E has completed the determination of the valid maximum allowable operating pressure (MAOP), based on the weakest section of the pipeline or component. The purpose of the MAOP validation is to ensure safe operation of natural gas transmission lines in class 3 and class 4 locations and class 1 and class 2 high consequence areas (HCA) that have not had a MAOP established through prior hydrostatic testing.

In total, MAOP validation was performed for all 2,088 miles of these transmission pipelines. In addition to completing NTSB Recommendation P-10-3, PG&E is validating all remaining transmission lines in non-HCAs by mid-2013. In 2012, PG&E completed the MAOP validation of 4,199 miles of non-HCA pipelines.

For recommendation P-11-24 (Work Clearance Procedures), PG&E has completed the revision and issuance of work clearance procedures that include requirements for identifying the likelihood and consequences of failure associated with planned work. The development of contingency plans is now a part of this process. PG&E's new procedure ensures accurate and completed clearance forms and requires field crews, control room operators and

Honorable Deborah A.P. Hersman
January 31, 2012
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individuals who have been assigned the clearance supervisor role to have complete knowledge of the intended work and written clearance procedure.

PG&E has completed recommendation P-11-31(Public Awareness Program Continuous Improvement) through the development and incorporation of written performance measurements and guidelines into our Public Awareness Plan (PAP) for evaluating the plan and for continuous program improvement. The primary objectives include awareness, damage prevention and emergency response readiness.

PG&E has also completed two portions of recommendation P-11-29 (Integrity Management Program): Revisions to PG&E's Risk Model and Risk Analysis Methodology.

Other recommendations with significant progress highlighted in the attachment include:

- (P-10-4)—In 2012, PG&E strength tested or verified an additional 202 miles for a total of 417 miles since 2011
- (P-11-2)—PG&E installed 46 valves in 2012 (for a total of 59 valves since 2010)
- (P-11-29)—In addition to revising the Integrity Management Risk Model and Risk Analysis Methodology, PG&E is continuing to revise other portions of its integrity management program

PG&E thanks the NTSB for both its continuing guidance and leadership as the company works to address the remaining safety recommendations.

Please contact me directly if you have any questions.

Sincerely,



Christopher P. Johns

EXHIBIT 3

PACIFIC GAS AND ELECTRIC COMPANY

CHAPTER 3

PG&E'S USE OF RECORDS

1 PG&E does not in all instances know where reconditioned pipe has
2 been placed in its transmission system. In the building of its Pipeline
3 Features List (PFL), PG&E has been gathering this information where it
4 is available. But the fact that an operator does not know where it has
5 placed reconditioned pipe would come as no surprise to policymakers
6 from an earlier era. In the years leading up to the initiation of the
7 proceeding in which the Commission adopted GO 112, the Commission
8 had circulated to California operators a staff proposal to impose pipeline
9 safety regulation. The staff proposal included a provision that provided:
10 "No used pipe or pipe of unknown specification shall be used in a
11 pipeline which is designed to operate at pressures of 300 psig or
12 more."¹⁷ PG&E submitted comments in response, explaining that the
13 ASA standards set forth "complete and adequate procedures" to qualify
14 pipe for reuse and contended that, "[w]ith proper inspection, repair and
15 test, re-use of this material should be permitted."¹⁸ Subsequently, the
16 Commission transmitted to the industry a revised staff draft that omitted
17 the language that would have prohibited the use of reconditioned pipe or
18 pipe of unknown specification. When, in December 1960, the
19 Commission adopted GO 112, it substantially adopted the ASME
20 standards governing the use of reconditioned pipe.¹⁹

¹⁷ Letter from California Public Utilities Commission to Natural Gas Utilities and Interested Parties, with the enclosed Proposed Rules Governing Design, Construction, Testing, Maintenance and Operation of Gas Transmission Pipeline, Section 221 (February 21, 1957) (Ex. 3-11).

¹⁸ Letter from John C. Morrissey, PG&E, to Public Utilities Commission, enclosed with Comments on Staff's Draft of Proposed Gas Transmission Line General Order, at 3-4 (April 29, 1957) (Ex. 3-12).

¹⁹ ASME B31.8 (1958) included a provision sanctioning the use of salvaged and conditioned pipe. "Removal of a portion of an operating line, and reuse of the pipe in the same line, or at a line operating at the same, or lower pressure, is permitted, subject only to the restrictions of paragraphs A, F and I in 811.27." Paragraphs A, F and I contained guidelines regarding inspection, surface defects and hydrostatic testing. To this day, ASME B31.8 Section 817 provides for the reuse of properly reconditioned pipe.

EXHIBIT 4

OBJECTID	LAYER_NAME	ROUTE_JOIN	FIELD_NAME	OLD_VALUE	NEW_VALUE	REPORT_DATE
2497	Pipeline	182A_102__0.0000	SMYS	35000		7/30/2005
49367	Pipeline	DCUST2331_444_2403-01_2.7700	SMYS	0		6/1/2006
49370	Pipeline	DCUST2325_427_2403-01_2.6000	SMYS	0		6/1/2006
47343	Pipeline	BD313__153_0.0000	SMYS	0	-35000	10/30/2007
47346	Pipeline	DCUST758_-_0111-04_0.0000	SMYS	0	-24000	10/30/2007
47348	Pipeline	DCUST758_-_0111-04_0.0000	SMYS	-24000	0	10/30/2007
47358	Pipeline	DCUST768_-_0111-14_0.0000	SMYS	0	-35000	10/30/2007
48755	Pipeline	6601-01_302.2_-_0.0000	SMYS	-35000		6/22/2006
57625	Pipeline	0124-01_102_105B_5.8800	SMYS	35000		10/31/2006
65024	Pipeline	169-15_106__0.0000	SMYS	35000		11/30/2006
76713	Pipeline	0107-02_108__0.0000	SMYS		35000	6/19/2008
76769	Pipeline	BD7045_601_021E_97.3555	SMYS		35000	5/31/2008
3536	Pipeline	2403-02_160.3_-_0.0000	SMYS	-35000	35000	2/16/2006
3978	Pipeline	121_108.1__0.0000	SMYS	52000	35000	9/23/2005
44379	Pipeline	7222-01_151_-_0.0000	SMYS	-30000	42000	5/18/2006
60400	Pipeline	DREG4775_101_137C_2.4600	SMYS	-24000		7/8/2011
60401	Pipeline	DREG4776_101_137C_2.7300	SMYS	-24000		7/8/2011
31347	Pipeline	DCUST1049_901_0813-09_0.4600	SMYS	0	35000	1/11/2006
31352	Pipeline	0813-08_101.4_-_0.0000	SMYS	-35000	42000	1/11/2006
31353	Pipeline	0840-01_304_-_0.0000	SMYS	-35000	35000	1/11/2006
42524	Pipeline	STUB6082_264_108_48.7000	SMYS	0	-24000	5/10/2006
42530	Pipeline	STUB6107_121_118B_12.8400	SMYS	0	-35000	5/10/2006
42534	Pipeline	STUB6190_551_173_6.0300	SMYS	0	-35000	5/10/2006
46911	Pipeline	153_147.3__0.0000	SMYS	42000	60000	10/21/2007
30752	Pipeline	7210-01_104_-_0.0000	SMYS	-35000	35000	3/22/2005
59961	Pipeline	7209-03_102.2__0.0000	SMYS	35000		1/17/2008
17041	Pipeline	0405-01_113.2_-_0.0000	SMYS	-35000	42000	8/5/2005
17096	Pipeline	0617-03_101_-_0.0000	SMYS	-35000	42000	8/5/2005
17100	Pipeline	1617-01_103.5_-_0.0000	SMYS	-35000	42000	8/5/2005
17110	Pipeline	7221-15_104_-_0.0000	SMYS	-35000	42000	8/5/2005
17111	Pipeline	7221-15_105.5_-_0.0000	SMYS	-35000	42000	8/5/2005
32160	Pipeline	0821-01_118.2_-_0.0000	SMYS	42000	-35000	7/2/2005
32165	Pipeline	0821-01_119.3_-_0.0000	SMYS	-42000	42000	7/2/2005

32168 Pipeline	0821-01_121_-_0.0000	SMYS	-42000	42000	7/2/2005
32169 Pipeline	0821-01_122.5_-_0.0000	SMYS	-42000	42000	7/2/2005
46566 Pipeline	DCUST8433_901_0604-16_0.1151	SMYS		-35000	10/24/2007
33911 Pipeline	X6566_100_7228-20_4.5200	SMYS	0	-35000	8/30/2007
76177 Pipeline	200-381_371_-_0.0000	SMYS	0	42000	6/26/2008
76179 Pipeline	200-383_373_-_0.0000	SMYS	0	42000	6/26/2008
76822 Pipeline	DREG4288_201_105N_21.9600	SMYS	-24000	35000	5/14/2008
14853 Pipeline	DREG5240_201_197C_22.4300	SMYS	-35000		1/18/2006
31810 Pipeline	0813-09_103.2_-_0.0000	SMYS	-35000	42000	1/11/2006
31812 Pipeline	0840-01_322.3_-_0.0000	SMYS	-35000	35000	1/11/2006
32491 Pipeline	103_135.9C_103_23.0900	SMYS	0		9/5/2007
73933 Pipeline	114_137_-_0.0000	SMYS	35000		5/13/2008
14944 Pipeline	2408-11_117.3_-_0.0000	SMYS	35000		1/14/2006
31869 Pipeline	0813-08_102_-_0.0000	SMYS	-35000	42000	1/11/2006
31875 Pipeline	0840-01_316_-_0.0000	SMYS	-35000	35000	1/11/2006
17024 Pipeline	300A_361.21_-_0.0000	SMYS	52000		6/9/2005
49549 Pipeline	0617-06_161.1_-_0.0000	SMYS	42000	35000	6/6/2006
47548 Pipeline	BD111_602_105N_0.0000	SMYS	-35000	35000	10/30/2007
47558 Pipeline	DCUST766_-_0111-13_0.0000	SMYS	0	-35000	10/30/2007
17789 Pipeline	1017-01_101_-_0.0000	SMYS	-35000		2/23/2007
47609 Pipeline	DCUST772_-_0112-01_0.0000	SMYS	0	-35000	10/30/2007
47628 Pipeline	DCUST777_-_0112-09_0.0000	SMYS	-24000	0	10/30/2007
47629 Pipeline	DCUST777_-_0112-09_0.0000	SMYS	-35000	-24000	10/30/2007
49620 Pipeline	0617-06_167_-_0.0000	SMYS	42000	35000	6/6/2006
33571 Pipeline	302-214_214.OX_-_0.0000	SMYS	35000		8/31/2007
47761 Pipeline	DCUST772_-_0112-01_0.0000	SMYS	-35000	-25000	10/30/2007
49100 Pipeline	7225-01_106_148_17.6294	SMYS	-35000	42000	6/27/2006
47767 Pipeline	DCUST776_-_0112-08_0.0000	SMYS	-35000	0	10/30/2007
47772 Pipeline	DCUST777_-_0112-09_0.0000	SMYS	0	-24000	10/30/2007
64058 Pipeline	DCUST1396_-_1302-02_0.0000	SMYS	0	-35000	11/7/2006
47827 Pipeline	DCUST777_-_0112-09_0.0000	SMYS	0	-24000	10/30/2007
47831 Pipeline	DCUST777_-_0112-09_0.0000	SMYS	0	-24000	10/30/2007
47836 Pipeline	DCUST781_-_0116-01_0.0000	SMYS	0	-35000	10/30/2007
47839 Pipeline	DCUST783_-_0117-07_0.0000	SMYS	-35000	0	10/30/2007

49266 Pipeline	DREG4493_801_1202-09_3.4600	SMYS	-35000	35000	7/2/2006
49270 Pipeline	1202-01_101_-_0.0000	SMYS	-35000	33000	7/2/2006
17336 Pipeline	0821-01_107.3_-_0.0000	SMYS	-35000	33000	5/14/2005
18038 Pipeline	0617-06_164.2_-_0.0000	SMYS	35000	42000	2/14/2007
17391 Pipeline	0821-01_107.7_-_0.0000	SMYS	-35000	35000	5/14/2005
17397 Pipeline	0821-01_116_-_0.0000	SMYS	-35000	42000	5/14/2005
17401 Pipeline	DREG4185_202_100_147.6300	SMYS	-24000	42000	5/14/2005
49273 Pipeline	DREG4490_801_1202-04_0.5300	SMYS	-35000	35000	7/2/2006
48667 Pipeline	DF3270_301_103_17.9800	SMYS	-24000	42000	6/17/2006
61441 Pipeline	DCUST752_100.3_1305-01_14.0000	SMYS	-35000		1/31/2008
76148 Pipeline	STAPIPE__195B3-1_0.0000	SMYS		-24000	6/20/2008
76154 Pipeline	X6326_505.1__0.0000	SMYS	0	-24000	6/20/2008
93505 Pipeline	DREG4223_307_101_41.4900	SMYS	-35000	35000	12/9/2008
106780 Pipeline	168-5-1_102__0.0000	SMYS	35000		5/9/2009
106808 Pipeline	118A_207.6__0.0000	SMYS	35000		5/19/2009
107093 Pipeline	DF3527_701_SP3_193.3000	SMYS	-35000	35000	5/16/2009
107096 Pipeline	X6366_502_X6366_0.0000	SMYS		-35000	5/16/2009
107113 Pipeline	X9919_101__0.0000	SMYS		-35000	5/16/2009
107117 Pipeline	DCUST9217_101_306_56.5393	SMYS		-28000	5/16/2009
107182 Pipeline	DREG5644_800_SP3_193.3000	SMYS	-35000	35000	5/16/2009
107189 Pipeline	DCUST9214_101_306_56.0010	SMYS		-28000	5/16/2009
173707 Pipeline	300B_263.7__0.0000	SMYS	-52000	60000	6/3/2011
123304 Pipeline	195A6-2_100.3__0.0000	SMYS	0	35000	9/2/2009
90234 Pipeline	DCUST9089_101_021E_117.1086	SMYS		-25000	10/31/2008
90236 Pipeline	DREG9088_101_021E_133.6657	SMYS		-35000	10/31/2008
121278 Pipeline	DCUST9994_100_0615-01_0.7248	SMYS		-24000	9/25/2009
137561 Pipeline	7202-01_331_7202-01_0.0000	SMYS	-35000	35000	5/21/2010
157164 Pipeline	0111-02_100.6_-_0.0000	SMYS	-35000		8/20/2010
168840 Pipeline	DRIP5690_619_132_51.5300	SMYS	-42000		1/5/2011
168841 Pipeline	GCUST6984_609_132_51.5300	SMYS	-35000	-24000	1/5/2011
168842 Pipeline	GCUST6984_625_132_51.5300	SMYS	-35000	-24000	1/5/2011
134812 Pipeline	169-14B-2_100.3__0.0000	SMYS	35000		4/10/2010

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served a copy **SAFETY AND ENFORCEMENT DIVISION'S REQUEST FOR OFFICIAL NOTICE** to all known parties by either United States mail or electronic mail, to each party named on the official service list attached in: R. 11-02-019

I also hand-delivered a hard copy to the assigned Administrative Law Judge's mail slot.

Executed on September 26, 2013 at San Francisco, California.

/s/ IMELDA EUSEBIO
Imelda Eusebio