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COMMITTEE ON  
ENERGY AND COMMERCE



## Congress of the United States House of Representatives

June 11, 2015

Stacy Cummings  
Interim Executive Director  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
East Building, 2<sup>nd</sup> Floor  
1200 New Jersey Ave., SE  
Washington, DC 20590

Dear Ms. Cummings:

I write to you regarding the operating status of Lines 901 and 903 of the Plains All American Pipeline on the Central Coast of California in my congressional district. As you are aware, after the May 19th crude oil spill from Line 901 along the Gaviota Coast, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued troubling reports of significant degradation of both Lines 901 and 903 that raise serious concerns of the ability of these lines to operate safely.

Even before the spill from this pipeline, the Santa Barbara community has regrettably had significant experience with devastating oil spills, most notably the 1969 offshore spill from Union Oil's Platform A. As a result of the 1969 spill and the community movement that stemmed from it, our community now rightfully demands very high environmental protection standards for all local industries, especially for oil and gas development. We expect companies to use the most advanced spill prevention, detection, and response technologies available, and there are serious concerns that Plains is not being held to this standard.

As you know, PHMSA's amended Corrective Action Order (CAO) issued on May 21, 2015 reported disturbing levels of corrosion on both Lines 901 and 903. According to the amended CAO, the May 5, 2015 in-line inspection data showed 45 percent metal loss at the rupture site of Line 901, yet third-party metallurgists on site estimated the metal loss at the rupture site to be closer to 80 percent, leaving only 1/16 of an inch of a metal barrier in this environmentally sensitive region. PHMSA inspectors also found three corrosion repairs near the rupture site made after the 2012 in-line inspection, and the May 5 inspection found three other areas of "extensive corrosion" on Line 901 requiring "immediate investigation and remediation."

While the spill occurred on Line 901, PHMSA also found concerning levels of corrosion on Line 903 during previous in-line inspections. In fact, an April 2013 investigation of the 38-mile segment of Line 903 between Gaviota Station and Sisquoc Station found "99 metal loss anomalies requiring investigation." A June 2013 inspection of the 75-mile segment of Line 903 between Sisquoc Station and Pentland Station found "a number of metal loss anomalies that may

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indicate general corrosion.” And the February 2014 inspection of the 15-mile segment of Line 903 between Pentland Station and Emidio Station had “two girth weld anomalies requiring investigation.”

This alarming pattern of corrosion on both Lines 901 and 903 is unacceptable and must be addressed prior to any consideration of restarting either of these pipelines. While a minimal amount of corrosion is understandable on an underground pipeline, the amount of corrosion on Lines 901 and 903 is clearly abnormal. In fact, Plains accelerated its in-line inspection schedule from once every five years to once every three years after the 2012 in-line inspection found 41 anomalies serious enough to require excavation. This pattern of significant corrosion calls into question the safety of the continued operation of these pipelines.

As I understand it, Line 903 was shut down on May 19th, restarted on May 29th, shut down again on May 30th, and will be briefly restarted again to purge Line 901 as required by PHMSA. After this purge is complete, it is critical that both of these lines remain shut down until a full investigation is complete, the corrosion issue is fully understood, corrective actions are taken, and it is demonstrated that both Lines 901 and 903 are safe to operate.

Additionally, please provide my office and the public with unredacted copies of the full results of the all in-line inspections of Lines 901 and 903 conducted in the last five years. Transparency is key to ensuring that our community is safe.

I ask that you respond to this letter in writing no later than the close of business on June 19, 2015.

Sincerely,

A handwritten signature in black ink that reads "Lois Capps". The signature is written in a cursive, flowing style.

**LOIS CAPPS**  
**Member of Congress**