RAILROAD COMMISSION OF TEXAS
OVERSIGHT AND SAFETY DIVISION
PIPELINE SAFETY DEPARTMENT

FORM C-LTR SUBMITTAL GUIDELINES

OVERVIEW

INSTRUCTIONS

When submitting Form C-LTR POPS Cover Letter, there are specific requirements that need to be met. This document outlines these requirements and serves as a guide to submitting Form C-LTR POPS Cover Letter. These requirements come from Railroad Commission of Texas (Commission, RRC) Rule 16 Texas Administrative Code (TAC) §8 and 49 Code of Federal Regulations (CFR) §192-195. To read the TAC rules, visit the Texas Secretary of State's website and navigate to 16 TAC §8. To read the CFR rules, visit the Government Publishing Office's website and navigate to 49 CFR §192-195.

BEFORE YOU START

- Review and understand 16 TAC §8.
- Review and understand 49 CFR §192-195.
- Review and understand Permitting and Mapping Help Documentation.
- Identify whether you will be completing the form using Adobe Acrobat Reader or your computer browser (Google Chrome is preferred).

PURPOSE OF FILING

The Form C-LTR POPS Cover Letter is used by Operators to provide more detail to the Commission about a permit application through the Pipeline Online Permitting System (POPS). Previously, the Commission allowed Operators to submit cover letters on their own company letterhead. The Form C-LTR POPS Cover Letter has replaced this method of submitting cover letters and standardized this process.

WHO FILES

Any Operator that needs to submit a permit application.

WHEN TO FILE

Operators must attach the Form C-LTR POPS Cover Letter as a PDF with every permit application submitted in POPS.

WHERE TO FILE

Operators must attach the Form C-LTR POPS Cover Letter as a PDF with every permit application in POPS. For help submitting permit applications in POPS, refer to the POPS User Guide.

HOW TO FILE

Fill out each section one at a time.

OPERATOR INFORMATION

As the Operator, fill out the **OPERATOR INFORMATION** section. You specify whether eminent domain has ever been declared for any pipelines under the permit being filed for. This section is required.

NOTE: If you make a mistake while filling out the form and need to clear it, you can close and reopen the form or refresh your computer browser, depending on how you're filling out the form.

OPERATOR INFORMATION

Operator Name

Operator Agent Name

P-5 Number

T-4 Permit Number

Date

Has eminent domain been exercised, either by the current or any previous operator, for any pipeline covered under this permit?

☐ Yes ☐ No

APPLICATION TYPE

Identify whether this Form C-LTR POPS Cover Letter is being filed for a Renewal, New Permit, Inactivate, Amendment, or Transfer. This section is required.

APPLICATION TYPE

☐ Renewal ☐ New Permit ☐ Inactivate ☐ Amendment / Transfer

NOTE: When you select an option for the **APPLICATION TYPE**, the form will show and hide subsequent sections to ensure that you are filling it out correctly.

Once you have identified the **APPLICATION TYPE**, continue to the corresponding section. You should only be filling out one of the four remaining sections of the form.

RENEWAL

The **RENEWAL** section should *only* be filled out if the **APPLICATION TYPE** is Renewal. The Total Active Renewal mileage field should indicate the active mileage for this permit being renewed.

RENEWAL

Only fill out this section of the form if the application being filed is for a Renewal. Renewal applications are used to complete an annual pipeline permit renewal. They cannot be used to report changes.

Total Active Renewal Mileage

NEW PERMIT

The **NEW PERMIT** section should *only* be filled out if the **APPLICATION TYPE** is New Permit. The Total Active New Permit Mileage should include all active mileage under the new permit. If the new permit is associated with a transfer, you must fill out Form T-4B and attach it in POPS when submitting the permit application.

NEW PERMIT

Only fill out this section of the form if the application being filed is for a New Permit. New Permit applications are used to create a new gas or liquid permit. If the application is completing an acquiring partial transfer, Form T-4B Pipeline Transfer Certification must be completed and attached.

Total Active New Permit Mileage

INACTIVATE

The **INACTIVATE** section should *only* be filled out if the **APPLICATION TYPE** is Inactivate. Select all that apply.

-The Abandoned in Place option should only be selected if pipelines have been abandoned in accordance with the rules and the operator does not intend to use the lines in the future.
-The Merged into T-4 Permit number option should only be selected if pipelines are being merged into another T-4 permit. The T-4 Permit number where the lines are being merged must be indicated.
-The Other option should only be selected for reasons not covered in the first two options. Use the ADDITIONAL INFORMATION section on page 3 to specify the reason(s).
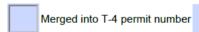
INACTIVATE

Only fill out this section of the form if the application being filed is for an Inactivate. Inactivate applications are used to cancel permits for pipelines that have been abandoned in place, merged into another permit, or any other circumstance with valid justification. Select all that apply.

☐ Abandoned in Place
By selecting this option, the operator acknowledges that the pipelines that were regulated (TX_REG=Y) prior to abandonment must be disconnected from all sources of gas/product, purged of all gas/product, sealed, and filled with water or inert materials in accordance with 49 CFR 192.727 or 49 195.402(c)(10). Failure to properly abandon in accordance with the rules could result in penalties being assessed.

Total Active Mileage Being Inactivated

☐ Merged into T-4 permit number

☐ Other (provide explanation in Additional Information section on page 3)

AMENDMENT / TRANSFER

The **AMENDMENT / TRANSFER** section should *only* be filled out if the **APPLICATION TYPE** is Amendment or Transfer. The list of amendment changes (T4_AMD codes) starts on Page 2 of the form.

AMENDMENT

Only fill out this section of the form if the application being filed is for an Amendment or Transfer. Amendment and Transfer applications are used to report changes to an existing permit. Indicate all changes that are being made along with the mileage being changed for this permit application. If the application is reporting a transfer (FT, PT, or TM), Form T-4B Pipeline Transfer Certification must be completed and attached. The two-letter codes correspond with the T4_AMD field in the shapefile; more information on the T4_AMD codes can be found in A Guide to Shapefile Submissions.

Make selections on the next page…

Multiple amendment changes can be reported on one Amendment application, but Partial Divesting Transfer and Acquire Transfer Merge applications are limited to only PT and NC, and TM and NC, respectively. If a Partial Divesting Transfer application reports more codes than just PT and NC, or if an Acquire Transfer Merge application reports more codes than just TM and NC, it will result in a rejection from the Commission.

Codes such as PT, TM, MP, PA, DP, and OM can be applied to Abandoned lines that have a STATUS_CD of "B". Use the **ADDITIONAL INFORMATION** section on page 3 to indicate amendments to Abandoned pipelines.

☐ FT: Full Transfer -- Indicates a full T-4 permit transfer to/from a different P-5; mapping not required.

☐ Divesting   ☐ Acquiring

☐ — Active mileage being transferred

☐ PT: Partial Transfer -- Assigned to pipeline segments as a portion of a T-4 permit transferring to/ from a different P-5.

☐ Divesting   ☐ Acquiring

☐ — Active mileage being transferred

☐ TM: Transfer Merge -- Assigned to pipeline segments being acquired and merged from a full permit transfer.
Indicate the permit numbers and mileage for each being acquired and merged in the Additional Information section on page 3.

☐ — Active mileage being acquired/merged

☐ MP: Merge Permits -- Assigned to pipeline segments being consolidated between permits within the same P-5.
Indicate the permit numbers and mileage for each being merged in the Additional Information section on page 3.

☐ — Active mileage being merged

☐ PA: Pipeline Addition -- Assigned to pipeline segments being added to the permit.

☐ — Active mileage being added

☐ BP: Abandoned in Place -- Assigned to pipeline segments that have been abandoned in place. By selecting this option, the operator acknowledges that the pipelines that were regulated (TX_REG=Y) prior to abandonment must be disconnected from all sources of gas/product, purged of all gas/product, sealed, and filled with water or inert materials in accordance with 49 CFR 192.727 or 49 195.402(c)(10). Failure to properly abandon in accordance with the rules could result in penalties being assessed.

☐ — Active mileage being abandoned

☐ DP: Delete Pipeline -- Assigned to pipeline segments being deleted from the permit.
Select all that apply, and use the Additional Information section on page 3 or a separate attachment to indicate the pipelines that apply to each selected reason.

☐ — Active mileage being deleted

☐ Production flow line not regulated by 16 TAC 3.70

☐ Distribution line not regulated by 16 TAC 3.70

☐ Physically removed from the ground

☐ Split within the same permit or added to another permit within the same P-5 *(provide explanation in Additional Information section on page 3)*

☐ Other *(provide explanation in Additional Information section on page 3)*

☐ OM: Other Modification -- Assigned to pipeline segments with attribute and/or geometry updates. Mileage box to indicate the +/- change in total active mileage; minus required for negative values.
Select all that apply, and use the Additional Information section on page 3 or a separate attachment to indicate the pipelines that apply to each selected reason.

☐ — Change in total active mileage (+/-)

☐ Pipelines being reclassified from regulated (TX_REG=Y) to un-regulated (TX_REG=N)

☐ Name change (SYS_NM, SUBSYS_NM, PLINE_ID, PLS_SYSNM)

☐ Other attribute changes (DIAMETER, COMMODITY1, QUALITY_CD, LOC_DES, USA, SMYS, PL_MAT_MTL, MAOP_PSIG, AREA_2A, AREA_2B, AREA_2C, PL_TYPE)

☐ Geometry updates/improved geographic accuracy

☐ Other *(provide explanation in Additional Information section on page 3)*

- FT: Full Transfer is not a T4_AMD code and therefore does not require a shapefile. It is used to report the transfer of an entire pipeline permit to or from a different Operator. Can be used to report either an acquisition or a divestiture. Mileage box is used to indicate the Active Mileage Being Transferred. Input that same mileage into the Total Active Mileage Before Amendment Changes and Total Active Mileage After Amendment Changes fields. Form T-4B must also be attached.
- PT: Partial Transfer is used to report the transfer of a portion of a pipeline permit to or from a different Operator. Can be used to report either an acquisition or a divestiture. Mileage box is used to indicate the Active Mileage Being Transferred. Form T-4B must also be attached.
- TM: Transfer Merge is used to report the acquisition and merge of one or more fully transferred permits from a divesting Operator. Mileage box is used to indicate the Active Mileage Being Acquired/Merged. Form T-4B must also be attached. Operator must indicate the permit numbers and mileage for each being merged in the Additional Information section on page 3.
- MP: Merge Permits is used to report the consolidation of permits within a P-5. An Inactivate application must be submitted for all the permits being consolidated (referred to as "merge permits") into another permit (referred to as the "keeper permit"). Operator must indicate the permit numbers and mileage for each being merged in the Additional Information section on page 3. Mileage box is used to indicate the Active Mileage Being Merged.
- PA: Pipeline Addition is used to report pipelines being added to an existing permit. Mileage box is used to indicate the Active Mileage Being Added.
- BP: Abandoned in Place is used to report regulated pipelines that have been abandoned in place in accordance with 49 CFR 192.727 or 49 195.402(c)(10), or un-regulated pipelines abandoned in place wit no intent for future use. Mileage box is used to indicate the Active Mileage Being Abandoned.
- DP: Delete Pipeline is used to remove a pipeline from an existing permit. Mileage box is used to indicate the Active Mileage Being Deleted. Select all the reasons that apply. Use the **Additional Information** section on page 3 to indicate the pipelines that apply to each selected reason by SYS_NM, SUBSYS_NM, PLINE_ID, or PLS_SYSNM. If the **Additional Information** section does not provide enough space, please attach additional pages or a separate document, such as a spreadsheet, that indicates the DP reasons that apply for each pipeline segment.
- OM: Other Modification is used to report any other changes that are not covered by the other T4_AMD codes. Mileage box is used to indicate the Change in Total Active Mileage. If there is no change in total active mileage resulting from using the OM code, input a value of 0 into the mileage box. If there is a positive change, input the value. If there is a negative change, input the value with a minus/negative sign in front. Use the **Additional Information** section on page 3 to indicate the pipelines that apply to each selected reason by SYS_NM, SUBSYS_NM, PLINE_ID, or PLS_SYSNM. If the **Additional Information** section does not provide enough space, please attach additional pages or a separate document, such as a spreadsheet, that indicates the OM reasons that apply for each pipeline segment.
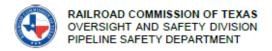
For all Amendment / Transfer applications, input the **Total Active Mileage Before Amendment Changes**. This should be the total active permit mileage excluding the identified amendment changes in Form C-LTR POPS Cover Letter. Once you have input all the amendment changes for this permit application, add/subtract them to/from the permit's Total Active Mileage Before Amendment Changes to calculate the **Total Active Mileage After Amendment Changes**.

Total Active Mileage Before Amendment Changes

Total Active Mileage After Amendment Changes

ADDITIONAL INFORMATION

You may use the **ADDITIONAL INFORMATION** section to notify the Commission of anything that was not covered in the rest of the form.

(*image shown on next page*)

RAILROAD COMMISSION OF TEXAS
OVERSIGHT AND SAFETY DIVISION
PIPELINE SAFETY DEPARTMENT

FORM C-LTR
April 2024

ADDITIONAL INFORMATION

Provide any other information that relates to the permit application…