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April 21, 2010

Stakeholder Correspondence – Tulare County Resource Management Agency

Mr. David Bryant  
Project Planner  
Tulare County Resource Management Agency  
5961 South Mooney Boulevard  
Visalia, California 93277

**Subject: Comments for the General Plan 2030 Update and the  
Re-circulated Draft Environmental Impact Report  
Chevron Environmental Management Company  
Historical Pipeline Portfolio–Bakersfield to Richmond**

Dear Mr. Bryant:

Chevron Environmental Management Company (CEMC) recently became aware of the Tulare County General Plan 2030 Update and Re-circulated Draft Environmental Impact Report (RDEIR). The purpose of this letter is to notify the Tulare County Resource Management Agency as to the location of formerly active crude-oil pipelines within Tulare County (Figure 1), and to provide background information about the former pipelines. The intent is that information regarding the location and construction of these pipelines will be incorporated into the RDEIR and future project development and environmental plans.

Portions of former Old Valley Pipeline (OVP) and Tidewater Associated Oil Company (TAOC) crude-oil pipelines existed in Tulare County. The OVP pipeline system was installed in the early 1900s and carried crude oil from the Kern River Oil Fields in and near Bakersfield to the Richmond Refinery until pipeline operations ceased in the 1940s. The TAOC pipeline system was also constructed in the early 1900s and transmitted crude oil from the southern San Joaquin Valley to the Bay Area until the 1970s.

The pipelines were originally installed at depths ranging from 18 inches to 10 feet below ground surface. The steel pipelines were typically encased in a protective coating composed of coal tar and asbestos-containing felt material (ACM). When pipeline operations ceased, the pipelines were taken out of commission. The degree and method of decommission varied; in some instances the pipelines were removed, while in others they remain in place.

Evidence of historic releases associated with the former OVP and TAOC pipelines is sometimes identified during the course of underground utility work and other subsurface construction activities near the former pipeline rights of ways (ROWs). Residual weathered crude oil associated with former OVP and TAOC pipeline operations can usually be observed visually; however, analytical testing is necessary to confirm the identity of the affected material. Analytical results from risk assessments performed by CEMC at numerous historical pipeline release sites confirm that soil affected by the historic release of crude oil from the pipelines is non-hazardous, and does not pose significant risks to human health.

Figure 1 illustrates the location of the former OVP and TAOC ROWs with respect to Tulare County regional planning framework, land use designations, and boundaries.

CEMC recommends that project proponents be prepared to potentially address residual weathered crude oil, pipelines, and ACM from the former OVP and/or TAOC pipelines during subsurface construction activities. This potentiality is easily managed with some advanced planning. CEMC would appreciate being informed of construction and land development projects proposed adjacent to the pipeline ROWs, and any encountered petroleum, pipelines, and pipeline-related ACM.

In addition, to facilitate the identification of Tulare County development and infrastructure projects proposed for construction along the pipeline ROWs, CEMC requests Geographic Information System (GIS) land development planning data. At your request, CEMC will provide GIS data that illustrates the location of the former OVP and TAOC pipelines in Tulare County.

For more information regarding these historic pipelines, please visit <http://www.hppinfo.com/>. If you have any questions, require additional information, or would like to request more detailed maps, please call SAIC-Benham consultants Tom Burns at (916) 979-3748 or Daniel Anzelon at (858) 826-3316.

Sincerely,



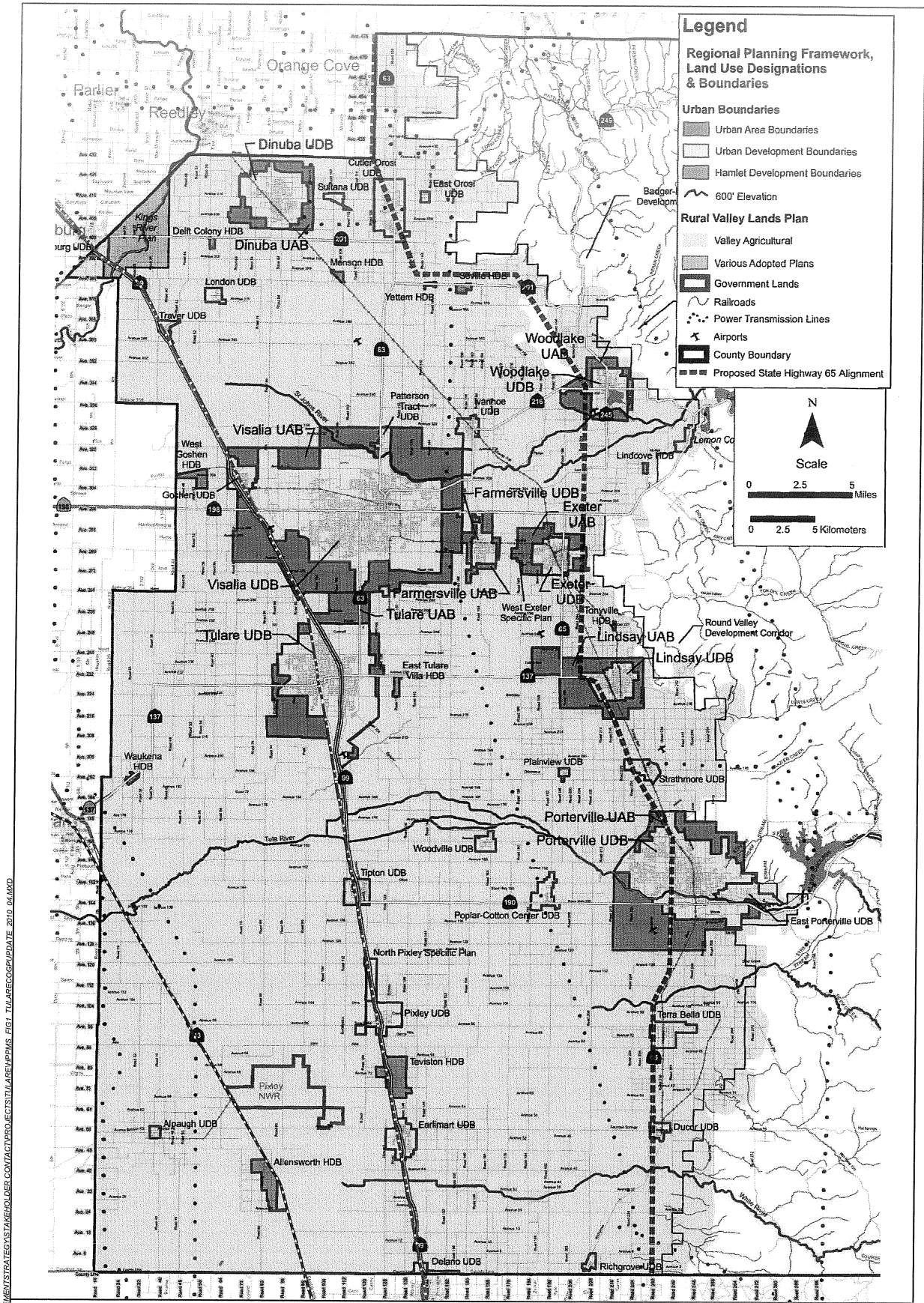
Lee Higgins

LPH/klg

Enclosures:

Figure 1. Historical Pipeline Rights of Ways – Tulare County General Plan 2030 Update

cc: Mr. Tom Burns – SAIC-Benham  
3800 Watt Avenue, Suite 210, Sacramento, California 95821  
Mr. Mike Jenkins – SAIC-Benham (letter only)  
3800 Watt Avenue, Suite 210, Sacramento, California 95821  
Mr. Mohamed Ibrahim – SAIC-Benham  
3800 Watt Avenue, Suite 210, Sacramento, California 95821  
Mr. Stuart Batstone – ARCADIS  
3240 El Camino Real, Suite 200 Irvine, California 92602





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Source: ESA, "Tulare County General Plan 2030 Update" (February 2010)



CALIFORNIA LOCATION MAP

 Historical Old Valley Pipeline (OVP)  
 Historical Tidewater Associated Oil Company (TAOC) Pipeline

**HISTORICAL PIPELINE RIGHTS OF WAY**

**TULARE COUNTY  
GENERAL PLAN 2030 UPDATE  
Tulare County, California**

DATE: 4/20/2010

ANALYST: MOORE/CYN

FIGURE:

 **The Benham Companies, LLC**  
 A Wholly-Owned Subsidiary  
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