

SUP-20-0001 (Baymark Pipeline, LLC.) &
SUP-20-0002 (South Texas NGL Pipeline, LLC.)

Requests	1. Hold a public hearing and make a recommendation to City Council for Special Use Permit Application, SUP-20-0001 (Baymark Pipeline, LLC.), to construct, operate and maintain a 12.75-inch pipeline with one, shared, above ground valve station. 2. Hold a public hearing and make a recommendation to City Council for Special Use Permit Application, SUP-20-0002 (South Texas NGL Pipelines, LLC.), to construct, operate and maintain an 8-inch pipeline with one, shared, above ground valve station. A Special Use Permit (SUP) is required for the pipelines and pump station (valve station) as a result of the Oil & Gas Ordinances in Chapter 42 and the Unified Development Code in Chapter 125 of the League City Code of Ordinances. Once an SUP is granted for a pipeline, an applicant must apply for and receive a Pipeline Permit from the City to begin construction.
Applicant	Jeffrey L. Waldo of Enterprise Products Operating, LLC.
Owners	Baymark Pipeline, LLC. and South Texas NGL Pipelines, LLC. (both subsidiaries of Enterprise Products)
Location	Generally having an alignment between the north side of Clear Creek just west of Landing Boulevard and the western city limits of League City within an existing CenterPoint Energy high power electrical corridor.
City Council	<i>Public Hearing and First Reading – January 12, 2021; Second Reading – January 26, 2021</i>
Citizen Response	538 - Notices Mailed to Property Owners within 500 feet 0 – Letters of Support Received 0 – Letters of Opposition Received 3 – Inquiries
Attachments	1. Aerial Map 2. Zoning Map 3. Pipeline Alignments 4. Valve Site and Screening Exhibit 5. Transportation Route 6. Engineer Letter on Casement 7. Property Owner Letters nearest to Valve Station

The Commission should consider the following in its deliberation for the Special Use Permit requests, which shall be utilized to substantiate its findings. To determine the extent to which the proposed use would be compatible with surrounding properties, the surrounding land uses and the performance impacts should be considered.

Background **October 4, 2019** – Staff met with representatives for the project to discuss potential SUP applications for two proposed pipelines along the electrical corridor in western League City.

November 19, 2019 – The Applicant held a neighborhood meeting to discuss the potential SUP applications with the surrounding property owners within 500 feet of the project alignment.

April 28, 2020 – Applications for Special Use Permits were submitted for both pipelines and a shared

valve station.

November 22, 2020 – Notice of public hearings were published in the newspaper. Planning staff sent out public hearing notices to the surrounding property owners and installed public hearing signs along the proposed alignment route.

December 14, 2020 – The Planning and Zoning Commission is scheduled to conduct a public hearing and make a recommendation to City Council.

January 12, 2021 – City Council is scheduled to conduct a public hearing and take action on the first reading of the SUP requests.

January 26, 2021 – Subject to approval of the first reading, City Council to consider the requests on the second reading.

**Project
Description**

The proposed pipelines are 8-inches and 12.75-inches in diameter and approximately 2 feet from each other. The pipelines will also share a valve station site.

The pipelines will run parallel to and approximately 3 feet west of an existing Enterprise Pipeline that was approved by the City Council in May of 2012. They will be located within a 30-foot wide pipeline easement in an existing 200-foot wide CenterPoint Energy High Power Electrical corridor. The valve station site will be the only location where the pipelines are above the ground. See Attachment #3.

The overall length of the alignment in League City is approximately 39,367 feet or 7.45 miles. Approximately 23,328 feet (59.3%) of the pipelines are to be constructed using the “cut and cover” construction method with the remaining 16,039 feet (40.7%) utilizing the Horizontal Directional Drilling (HDD) method. There are eight (8) HDD boring locations within League City, used to cross features such as Clear Creek, Magnolia Creek and nine rights-of-way. The pipelines will be no less than 4 feet below ground with average depths of the HDD borings being approximately 45 feet below grade.

**Easement
Agreement**

At this time, the Applicant has provided approved easement agreements for all except the easement agreement with League City. The proposed agreement with the City is separately and simultaneously being coordinated by staff and will be considered by City Council at the same time as the pipeline SUP requests.

Valve Station

Valves for the pipelines will be located in a shared, 45-foot-wide by 70-foot-long, screened valve station enclosure in a north/south configuration. The proposed site will be located approximately 900 feet north of West Main Street (Farm to Market Road 518) and just south of an existing Enterprise Pipeline valve station. Below is information provided by the Applicant regarding the valve station site.

- The valve site is required by the U.S. Department of Transportation (DOT) / Texas Railroad Commission (Texas RRC) as a block valve for Clear Creek. There will be similar valve on the north side of Clear Creek in Webster.
- The valve site is intended to be monitored and automated so that it can be shut down from our Pipeline Control Center in Houston in the event of an emergency. This automation requires the installation of power and the power control center “bus stop” that is shown in the drawings. It has been agreed to install the power connection underground from CenterPoint.
- Under normal conditions, no noise will result of the valve station. Operation of the valve site will be for emergencies, maintenance, and required function testing.
 - Emergency and maintenance operation of the valves will be very rare. The pipelines are required to function test the valves twice per calendar year at intervals not exceeding 7 ½ months. Valves of this size will operate from open to close in the range of 90 seconds or less. The valve actuators are not noisy devices and will operate for a very short time on a very limited basis.
 - The phase converter along with a transformer is a device to convert standard 120 / 240-volt single phase power to 480-volt three phase power to feed the valve actuators. This set up allows connection to the most common power supply without installing additional power lines. This device is also a relatively quiet device and only operates for the time that the valve is in operation

(minimal frequency and duration).

- The standard installation includes an area light as shown on the drawings. The bus stop has a standard fluorescent light with a switch in the cabinets that can be utilized for maintenance purposes. The bus stop was raised slightly to meet Base Flood Elevation requirements.

Access

Access to construct the pipelines will be from several pre-established locations on Texas Department of Transportation (TxDOT) roadways such as I-45, Farm to Market Road 518 and Farm to Market Road 517 as well as some municipal roadways such as Bay Area Boulevard, League City Parkway, and McFarland Road. The intent is to maximize TxDOT roadways for access while minimizing the local roadways to limit the surrounding neighborhoods to the truck traffic and noise related to construction of the pipelines. The Applicant has coordinated with the Engineering Department to minimize any transportation related issues.

Departures from Requirements

As mentioned previously, the applications have three departure requests from the Ordinances that are listed below:

1. Requirement: All pipelines under city rights-of-way shall be cased.

Request: The Applicant proposes to increase the wall thickness of the pipe underneath the rights-of-way in lieu of casement. See Attachment #6. The attached letter indicates that there is a greater potential of maintenance issues and pipe corrosion by casing the pipe.

While pipelines have cathodic protection, the area between the pipe and the casement has been of constant concern expressed by past applicants due to inaccessibility. To date, all previous pipeline applications have requested and received permission for this departure.

2. Requirement: Valve stations (defined as pump stations) shall have a 50-foot wide landscaped buffer yard installed in accordance to the City ordinance.

Request: The Applicant proposes to install chain link fencing with fence slats inserted into the fencing around the valve station site. See Attachment #4. It is indicated that CenterPoint does not allow landscaping in their easements. The pipeline company also prefers to have a chain link fence so that the site may be accessed quickly with large equipment in case of an emergency. The Applicant has reached out to the two closest residential property owners to the west in which it was agreed green slats would be installed in the fencing for greater screening. See Attachment #7.

CenterPoint's landscaping prohibition is known from previous public and private projects in the past. Due to the proposed screening and juxtaposition with other nearby features for the valve site a condition has been proposed to maximize screening from the residences to the west.

3. Requirement: Pump stations cannot be located within 600 feet of any off-site building or structure, public/private park, school or daycare.

Request: It is proposed to locate the pipelines within the CenterPoint Electrical corridor. The corridor has a maximum width of approximately 250 to 275 feet in width. The proposed alignment is the best, most logical and efficient location to place the pipelines in its relation to its overall route and adjacency to other pipelines.

The CenterPoint corridor is the widest location on the western side of League City to locate these pipelines as evidenced by the existence of several other pipelines within this corridor. Other open space areas on this side of League City are features such as creeks or for drainage ditches of lesser width.

Safety Measures According to the DOT, pipelines are considered safer as a result of better materials and testing methods used to verify integrity of a pipeline. The Applicant has indicated that the pipelines have been designed to be installed, tested, operated and maintained to meet the regulatory standards established by the Pipeline and Hazardous Materials Safety Administration (PHMS) of the DOT, TxDOT and the Texas RRC.

Enterprise Products have a specific Emergency Response Procedures Plan/Manual for the pipelines. This document has been reviewed by the Emergency Management Coordinator, Ryan Edghill, in which he had no objections to the plan/manual.

Public Benefit vs. Imposed Hardship Based upon the information provided, the Commission will have to determine “the gain to public health, safety, welfare, due to denial of this application as compared to the hardship imposed upon the owner as a result of denial of the application.”

Section 3.14.10.f. of the Unified Development Code outlines three items of consideration that the Planning and Zoning Commission and City Council shall decide when hearing a pipeline SUP request:

1. Whether the operations of the proposed pipelines are reasonable under the circumstances and conditions prevailing in the area considering the particular location and the character of the improvements located there.

The proposed pipelines are proposed to locate in an existing 200-foot-wide CenterPoint Energy corridor easement where several other pipelines exist.

2. Whether there are other alternative pipeline alignment locations.

Proposing the pipelines in a location near adjacent pipelines within an energy corridor is preferred as opposed to alternate alignments that could be located closer to multiple structures and neighborhoods.

3. Where the operations are consistent with the health, safety and welfare of the public when and if conducted in accordance with the pipeline operation permit conditions to be imposed.

The Operators are required to meet all state and federal regulations. Additionally, pipelines must meet Chapter 42, Article V: entitled Pipelines and Pump Stations of the League City Code of Ordinances.

Recommendation and Potential Conditions Staff recommends approval of the Special Use Permit requests, subject to the following conditions:

1. Prior to the issuance of the SUPs, the City of League City must grant approval for the agreement of the proposed easement alignment.
2. Power poles installed to service the valve site shall be of a height and located where the valve station enclosure will screen the poles from view of the residences to the west.
3. The Contractor must provide at least 24 hours’ notice to the Oil & Gas Coordinator prior to crossing any 24-inch or 42-inch public water mains in support of Water Production’s request to be on-site during these crossings.

Recommended Motion Motion for approval of SUPs – SUP-20-0001 (Baymark Pipeline) and SUP-20-0002 (South Texas NGL), subject to the proposed conditions.

For additional information, you may contact Mark Linenschmidt, Senior Planner at 281-554-1078 or at mark.linenschmidt@leaguecity.com.

Exhibit #3

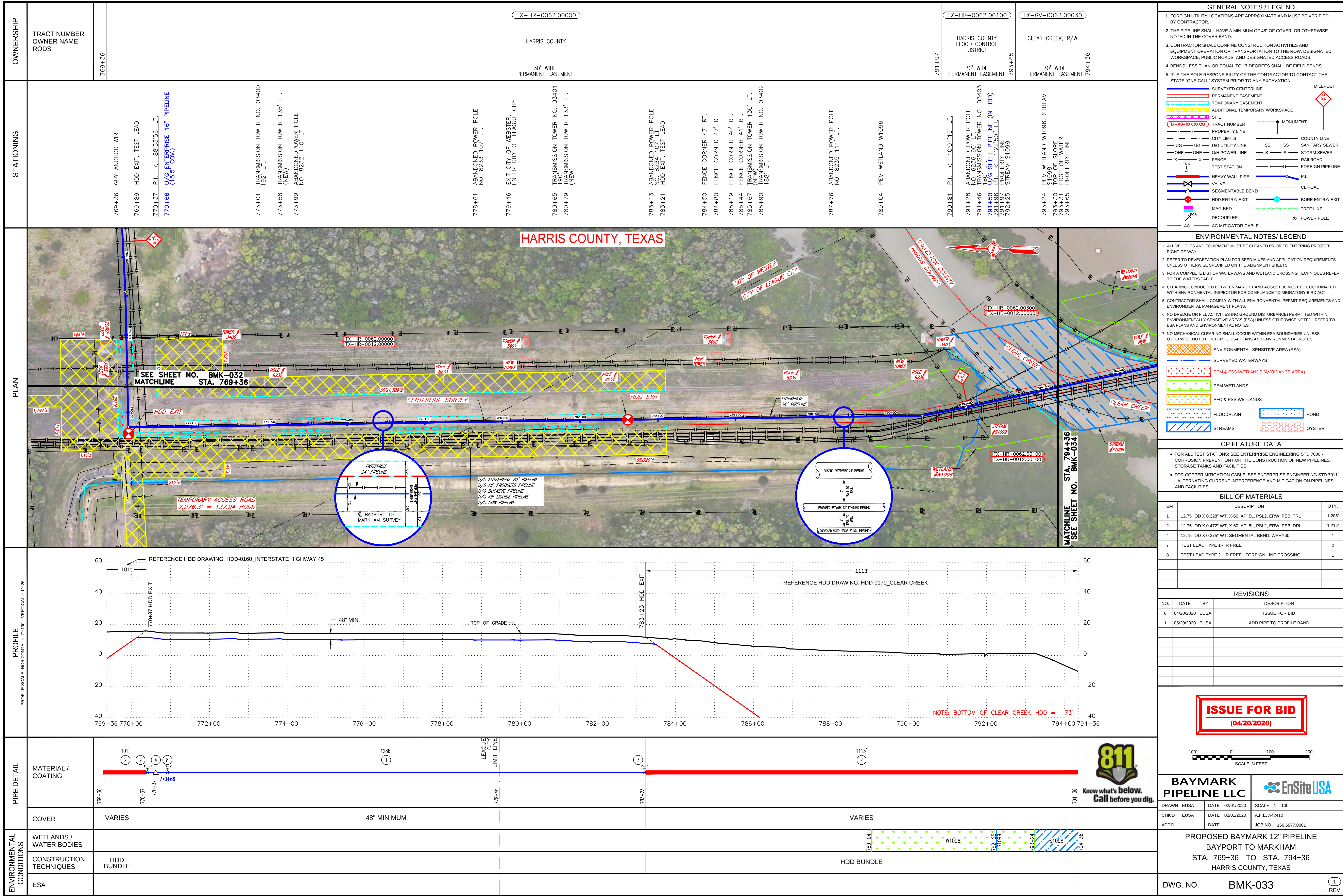


Exhibit #3

Engineering drawing for a proposed pipeline project in Galveston County, Texas. The drawing includes a plan view, a profile view, and a detail view of the pipe material and coating.

GENERAL NOTES / LEGEND

- FOREIGN UTILITY LOCATIONS ARE APPROXIMATE AND MUST BE VERIFIED BY CONTRACTOR.
- THE PIPELINE SHALL HAVE A MINIMUM OF 48" OF COVER, OR OTHERWISE NOTED IN THE COVER BAND.
- CONTRACTOR SHALL CONFINED CONSTRUCTION ACTIVITIES AND EQUIPMENT OPERATION OR TRANSPORTATION TO THE ROW, DESIGNATED WORKSPACE, PUBLIC ROADS, AND DESIGNATED ACCESS ROADS.
- BENDS LESS THAN OR EQUAL TO 17 DEGREES SHALL BE FIELD BENDS.
- IT IS THE SOLE RESPONSIBILITY OF THE CONTRACTOR TO CONTACT THE STATE "ONE CALL" SYSTEM PRIOR TO ANY EXCAVATION.

ENVIRONMENTAL NOTES/LEGEND

- ALL VEHICLES AND EQUIPMENT MUST BE CLEANED PRIOR TO ENTERING PROJECT RIGHT-OF-WAY.
- REFER TO REVEGETATION PLAN FOR SEED MIXES AND APPLICATION REQUIREMENTS UNLESS OTHERWISE SPECIFIED ON THE ALIGNMENT SHEETS.
- FOR A COMPLETE LIST OF WATERWAYS AND WETLAND CROSSING TECHNIQUES REFER TO THE WATERS TABLE.
- CLEARING CONDUCTED BETWEEN MARCH 1 AND AUGUST 30 MUST BE COORDINATED WITH ENVIRONMENTAL INSPECTOR FOR COMPLIANCE TO MIGRATORY BIRD ACT.
- CONTRACTOR SHALL COMPLY WITH ALL ENVIRONMENTAL PERMIT REQUIREMENTS AND ENVIRONMENTAL MANAGEMENT PLANS.
- NO DREDGE OR FILL ACTIVITIES (NO GROUND DISTURBANCE) PERMITTED WITHIN ENVIRONMENTALLY SENSITIVE AREAS (ESA) UNLESS OTHERWISE NOTED. REFER TO ESA PLANS AND ENVIRONMENTAL NOTES.
- NO MECHANICAL CLEARING SHALL OCCUR WITHIN ESA BOUNDARIES UNLESS OTHERWISE NOTED. REFER TO ESA PLANS AND ENVIRONMENTAL NOTES.

CP FEATURE DATA

- FOR ALL TEST STATIONS: SEE ENTERPRISE ENGINEERING STD 7000 - CORROSION PREVENTION FOR THE CONSTRUCTION OF NEW PIPELINES, STORAGE TANKS AND FACILITIES
- FOR COPPER MITIGATION CABLE: SEE ENTERPRISE ENGINEERING STD 7011 - ALTERNATING CURRENT INTERFERENCE AND MITIGATION ON PIPELINES AND FACILITIES

BILL OF MATERIALS

ITEM	DESCRIPTION	QTY.
1	12.75" OD X 0.328" WT, X-60, API 5L, PSL2, ERW, PEB, TRL	1,227'
2	12.75" OD X 0.472" WT, X-60, API 5L, PSL2, ERW, PEB, DRL	1,273'
4	12.75" OD X 0.375" WT, SEGMENTAL BEND, WPHY60	1
6	VALVE	1
7	TEST LEAD TYPE 1 - IR FREE	2
13	NEW RECTIFIER	1

REVISIONS

NO.	DATE	BY	DESCRIPTION
0	04/20/2020	EUSA	ISSUE FOR BID
1	05/20/2020	EUSA	ADD PIPE TO PROFILE BAND
2	06/15/2020	EUSA	ADD DISTANCE FOR NEARBY VALVES

ISSUE FOR BID
(04/20/2020)

BAYMARK PIPELINE LLC
EnSiteUSA

DRAWN: EUSA DATE: 02/01/2020 SCALE: 1"=100'
CHK'D: EUSA DATE: 02/01/2020 A.F.E. A42412
APP'D: DATE: JOB NO. 156.0977.0001

PROPOSED BAYMARK 12" PIPELINE
STA. 794+36 TO STA. 819+36
GALVESTON COUNTY, TEXAS

DWG. NO. BMK-034

Exhibit #3

OWNERSHIP

TRACT NUMBER
OWNER NAME
RODS

TX-GV-0082.00000

TX-GV-0082.00010

TX-GV-0083.00000

TX-GV-0084.00000

TX-GV-0084.00010

TX-GV-0085.00000

TX-GV-0086.00000

TX-GV-0087.00000

TX-GV-0086.00010

TX-GV-0086.00000

TX-GV-0087.00000

TX-GV-0086.00010

TX-GV-0088.00000

TX-GV-0088.00000

844+36

845+13

845+38

845+63

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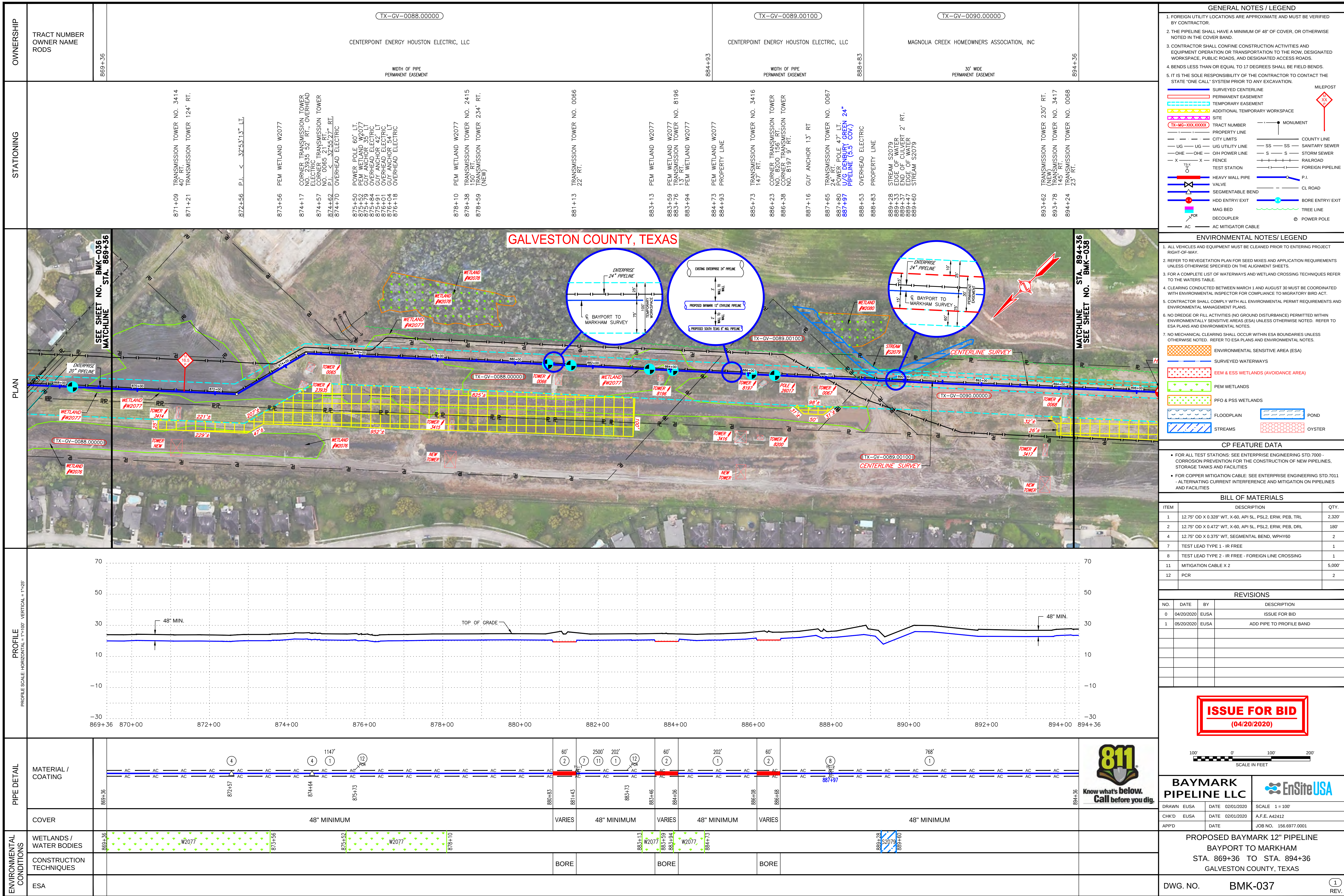
929+88

930+13

930+38

930+

Exhibit #3



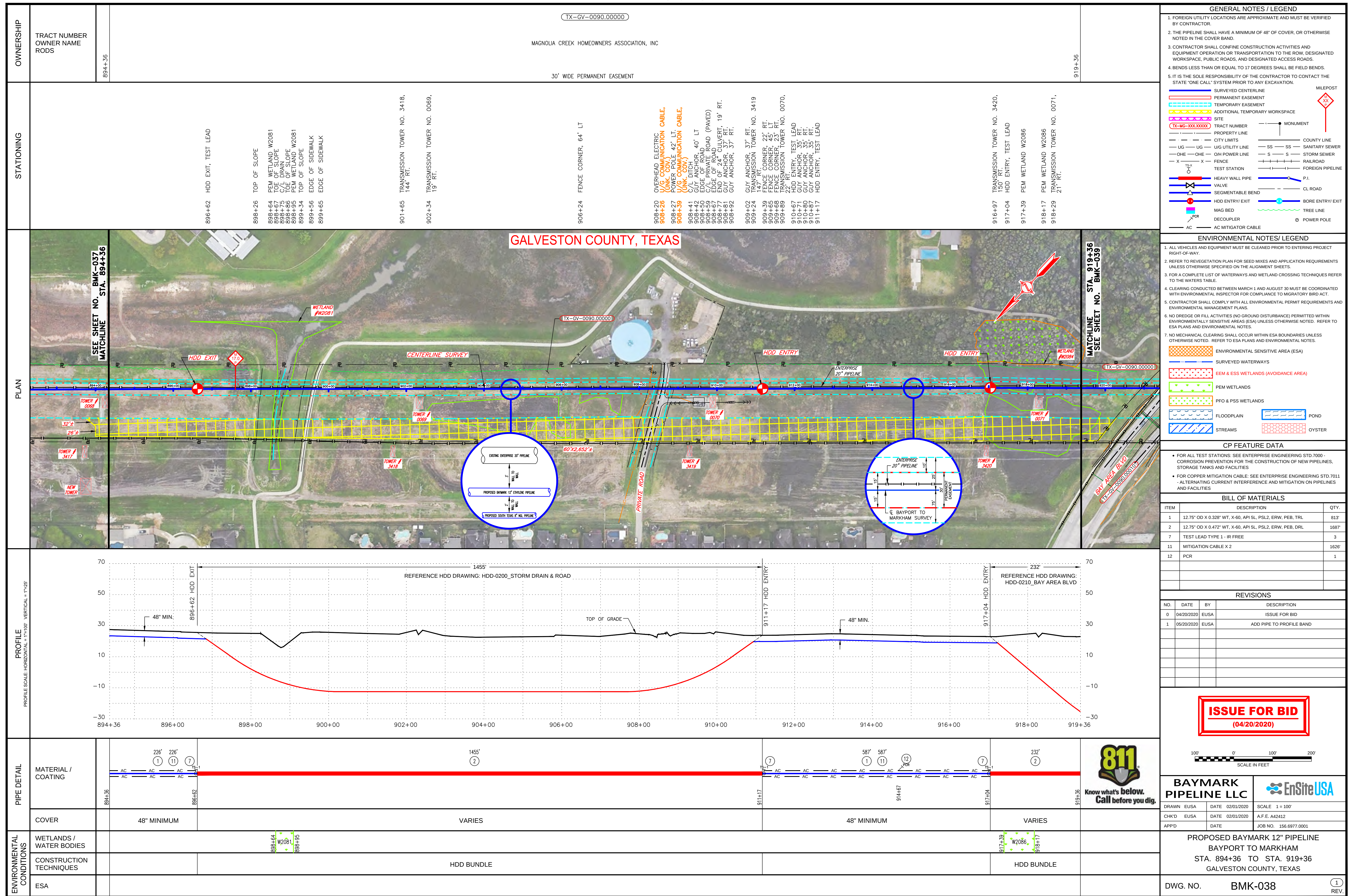


Exhibit #3

OWNERSHIP

TRACT NUMBER
OWNER NAME
RODS

944+36

TX-GV-0091.00000

2009 XIF, LLC

30' WIDE PERMANENT EASEMENT

954+26

STATIONING

944+51 TOP OF SLOPE

TRANSMISSION TOWER NO. 3424,
144' RI.

TRANSMISSION TOWER NO. 0075,
22' RI.

PEN WETLAND W2091

PEN WETLAND W2091

PROPERTY LINE

TRANSMISSION TOWER NO. 0076,
20' RI.

TRANSMISSION TOWER NO. 3425,
145' RI.

PROPERTY LINE

C/L W. LEAGUE CITY PARKWAY

EDGE OF ROAD

U/G STORM SEWER LINE, (UNK. COV.)

EDGE OF ROAD

C/L W. LEAGUE CITY PARKWAY

EDGE OF ROAD

PROPERTY LINE

U/G COMMUNICATION CABLE,
(UNK. COV.)

EDGE OF SIDEWALK

EDGE OF SIDEWALK

HDD EXIT, TEST LEAD

TRANSMISSION TOWER NO. 0077,
21' RI.

TRANSMISSION TOWER NO. 3426,
144' RI.

969+36

PLAN

SEE SHEET NO. BMK-039
MATCHLINE STA. 944+36

ENTERPRISE 20" PIPELINE

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Exhibit #3



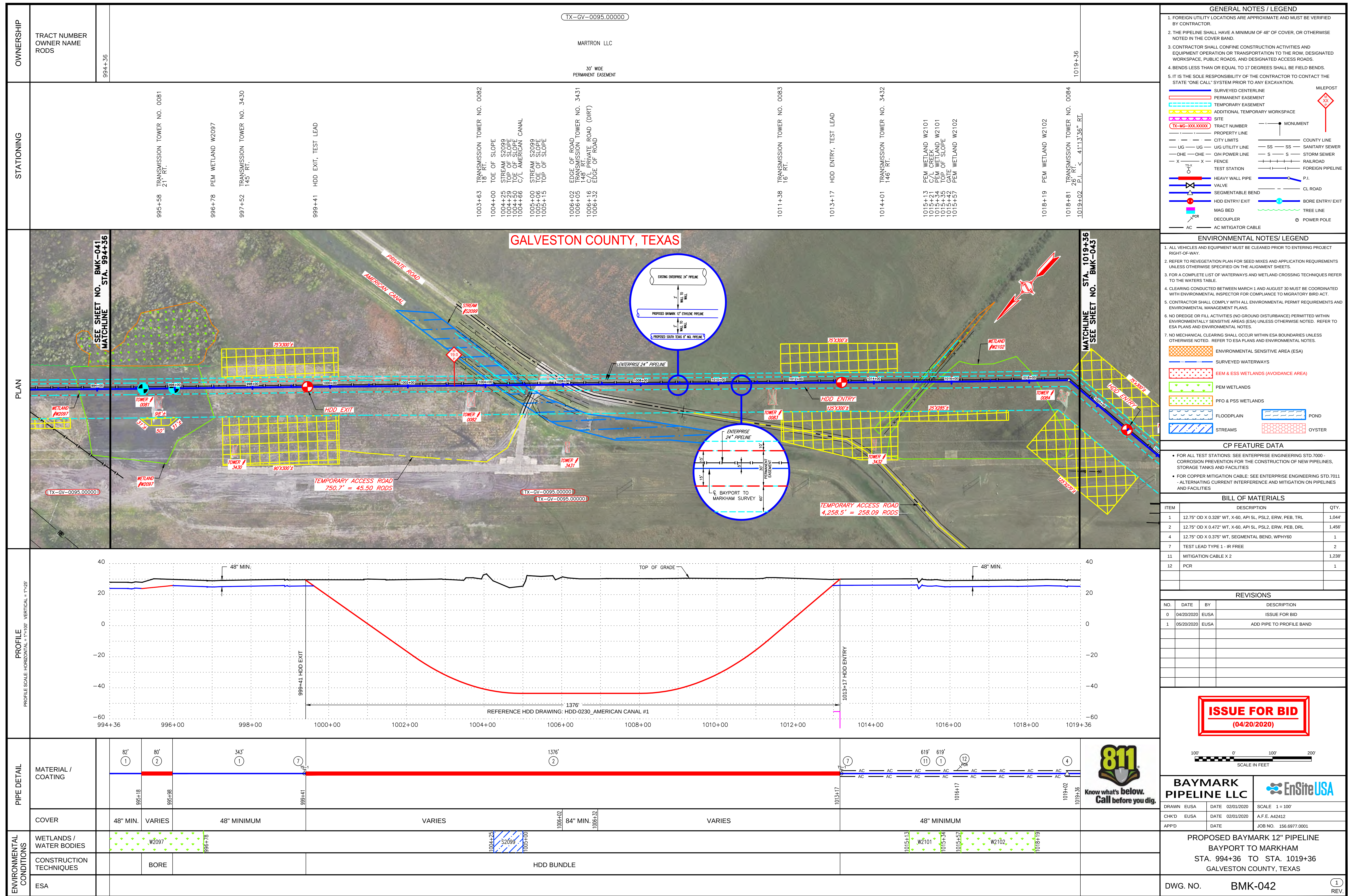


Exhibit #3

[illegible]

Exhibit #3

OWNERSHIP

TRACT NUMBER
OWNER NAME
RODS

1094+36

STATIONING

1094+47 TOP OF SLOPE
1094+51 TOP OF SLOPE
1094+52 TOP OF SLOPE
1094+57 TOP OF SLOPE
1096+36 TRANSMISSION TOWER NO. 0094
23' RT.
1104+05 TRANSMISSION TOWER NO. 0095
22' RT.
1111+75 TRANSMISSION TOWER NO. 0096
24' RT.
1117+90 FENCE SLOPE
1117+91 PEM WETLAND W2112
1117+96 C/L DITCH
1117+98 PEM WETLAND W2112
1117+76 PEM WETLAND W2112
1117+79 TOP OF SLOPE
1117+90 PROPERTY LINE

WESLEY WEST CATTLE, L.P., ET AL

30' WIDE
PERMANENT EASEMENT

TX-GV-0101.00000

THE ESTATE OF
GEORGE A.
BOFYSIL, JR

30' WIDE
PERMANENT EASEMENT

TX-GV-0103.00000

PLAN

PROFILE

PIPE DETAIL

MATERIAL / COATING	AC
COVER	48" MINIMUM

ENVIRONMENTAL CONDITIONS

WETLANDS / WATER BODIES	
CONSTRUCTION TECHNIQUES	
ESA	

GENERAL NOTES / LEGEND

- FOREIGN UTILITY LOCATIONS ARE APPROXIMATE AND MUST BE VERIFIED BY CONTRACTOR.
- THE PIPELINE SHALL HAVE A MINIMUM OF 48" OF COVER, OR OTHERWISE NOTED IN THE COVER BAND.
- CONTRACTOR SHALL CONFINE CONSTRUCTION ACTIVITIES AND EQUIPMENT OPERATION OR TRANSPORTATION TO THE ROW, DESIGNATED WORKSPACE, PUBLIC ROADS, AND DESIGNATED ACCESS ROADS.
- BENDS LESS THAN OR EQUAL TO 17 DEGREES SHALL BE FIELD BENDS.
- IT IS THE SOLE RESPONSIBILITY OF THE CONTRACTOR TO CONTACT THE STATE "ONE CALL" SYSTEM PRIOR TO ANY EXCAVATION.

SURVEYED CENTERLINE

PERMANENT EASEMENT

TEMPORARY EASEMENT

ADDITIONAL TEMPORARY WORKSPACE

SITE

TRACT NUMBER

PROPERTY LINE

CITY LIMITS

UG - UG - UG UTILITY LINE

OHE - OHE - OHE POWER LINE

FENCE

TEST STATION

HEAVY WALL PIPE

VALVE

SEGMENTABLE BEND

HDD ENTRY/EXIT

MAG BED

DECOUPLER

AC

AC MITIGATOR CABLE

MONUMENT

COUNTY LINE

SANITARY SEWER

STORM SEWER

RAILROAD

FOREIGN PIPELINE

P.I.

CL ROAD

BORE ENTRY/EXIT

TREE LINE

POWER POLE

ENVIRONMENTAL NOTES/ LEGEND

- ALL VEHICLES AND EQUIPMENT MUST BE CLEANED PRIOR TO ENTERING PROJECT RIGHT-OF-WAY.
- REFER TO REVEGETATION PLAN FOR SEED MIXES AND APPLICATION REQUIREMENTS UNLESS OTHERWISE SPECIFIED ON THE ALIGNMENT SHEETS.
- FOR A COMPLETE LIST OF WATERWAYS AND WETLAND CROSSING TECHNIQUES REFER TO THE WATERS TABLE.
- CLEARING CONDUCTED BETWEEN MARCH 1 AND AUGUST 30 MUST BE COORDINATED WITH ENVIRONMENTAL INSPECTOR FOR COMPLIANCE TO MIGRATORY BIRD ACT.
- CONTRACTOR SHALL COMPLY WITH ALL ENVIRONMENTAL PERMIT REQUIREMENTS AND ENVIRONMENTAL MANAGEMENT PLANS.
- NO DREDGE OR FILL ACTIVITIES (NO GROUND DISTURBANCE) PERMITTED WITHIN ENVIRONMENTALLY SENSITIVE AREAS (ESA) UNLESS OTHERWISE NOTED. REFER TO ESA PLANS AND ENVIRONMENTAL NOTES.
- NO MECHANICAL CLEARING SHALL OCCUR WITHIN ESA BOUNDARIES UNLESS OTHERWISE NOTED. REFER TO ESA PLANS AND ENVIRONMENTAL NOTES.

ENVIRONMENTAL SENSITIVE AREA (ESA)

SURVEYED WATERWAYS

EEM & ESS WETLANDS (AVOIDANCE AREA)

PEM WETLANDS

PFO & PSS WETLANDS

FLOODPLAIN

STREAMS

POND

OYSTER

CP FEATURE DATA

- FOR ALL TEST STATIONS: SEE ENTERPRISE ENGINEERING STD.7000 - CORROSION PREVENTION FOR THE CONSTRUCTION OF NEW PIPELINES, STORAGE TANKS AND FACILITIES
- FOR COPPER MITIGATION CABLE: SEE ENTERPRISE ENGINEERING STD.7011 - ALTERNATING CURRENT INTERFERENCE AND MITIGATION ON PIPELINES AND FACILITIES

BILL OF MATERIALS

ITEM	DESCRIPTION	QTY.
1	12.75" OD X 0.328" WT, X-60, API 5L, PS2, ERW, PEB, TRL	2,183'
2	12.75" OD X 0.472" WT, X-60, API 5L, PS2, ERW, PEB, DRL	317'
11	MITIGATION CABLE X 2	4,408'
12	PCR	4

REVISIONS

NO.	DATE	BY	DESCRIPTION
0	04/20/2020	EUSA	ISSUE FOR BID
1	05/20/2020	EUSA	ADD PIPE TO PROFILE BAND

ISSUE FOR BID

(05/20/2020)

811

Know what's below.
Call before you dig.

BAYMARK PIPELINE LLC

EnSiteUSA

DRAWN EUSA

DATE 02/01/2020

SCALE 1" = 100'

CHK'D EUSA

DATE 02/01/2020

A.F.E. A42412

APP'D

DATE

JOB NO. 156.6977.0001

PROPOSED BAYMARK 12" PIPELINE

BAYPORT TO MARKHAM

STA. 1094+36 TO STA. 1119+36

GALVESTON COUNTY, TEXAS

DWG. NO.

BMK-046

REV

1

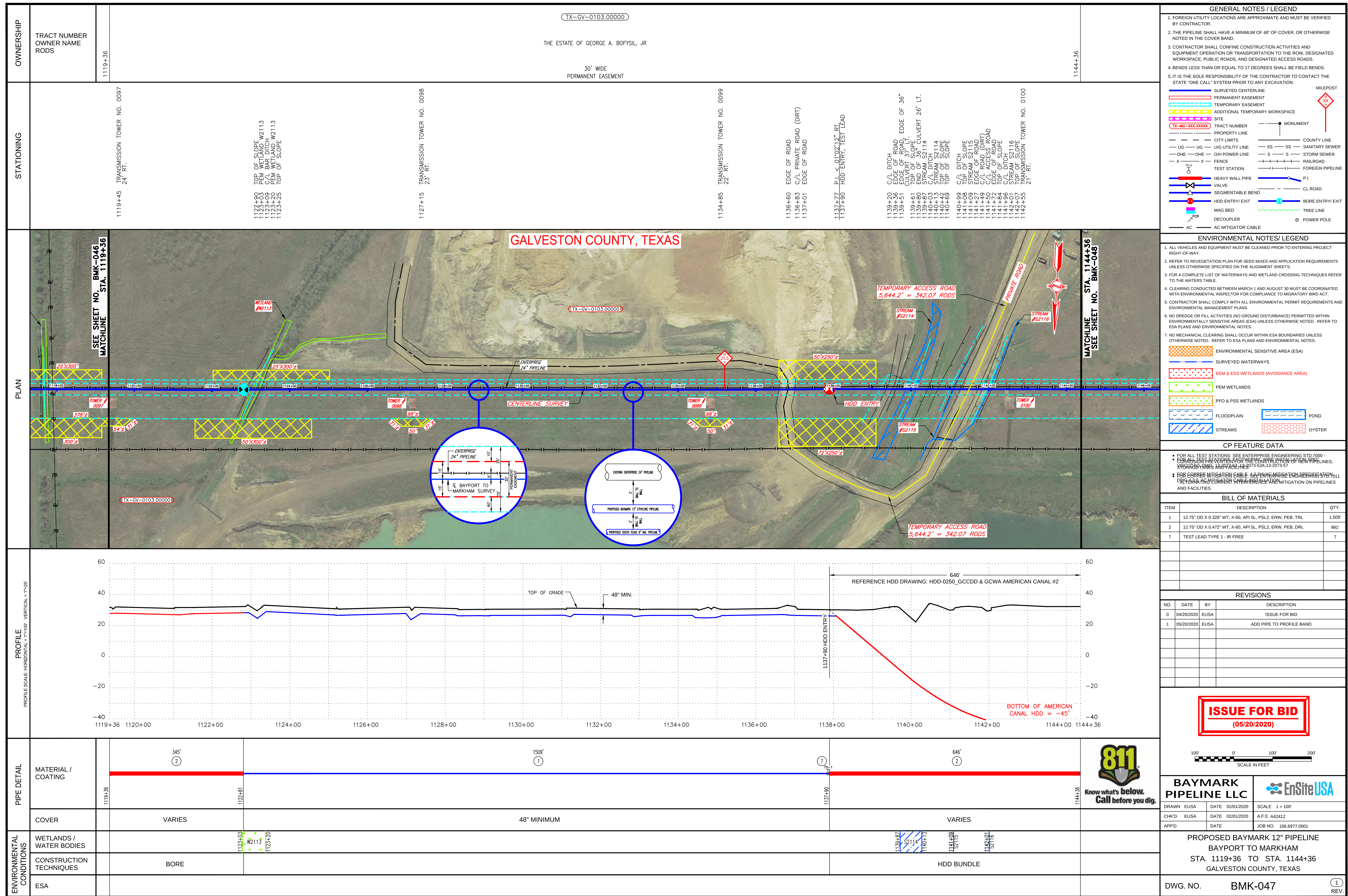
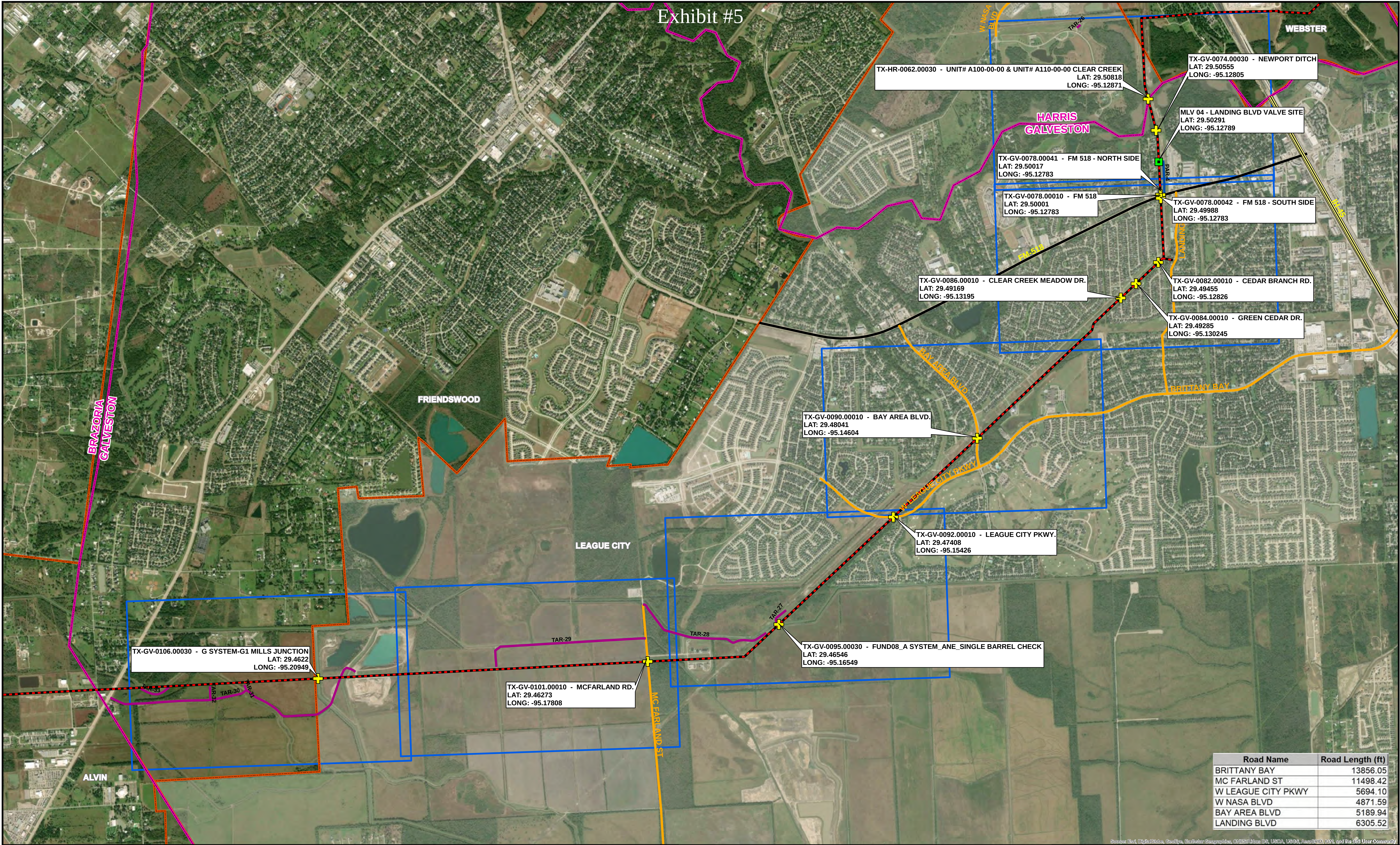
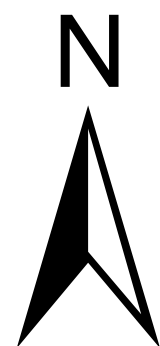


Exhibit #3

[illegible]



- Proposed Route
- AccessRoads_Permanent
- AccessRoads_Temporary
- Haul Roads_League City
- Haul Roads_Farm to Market
- Haul Roads_US Highway
- Surface Site
- Permits
- County Boundary
- City Boundary



BAYMARK PIPELINE LLC
&
SOUTH TEXAS NGL PIPELINES, LLC

ISSUED FOR REVIEW

0 1,250 2,500 5,000
Feet

LEAGUE CITY PERMIT VICINITY MAP

1 " = 1,250 feet

Date: 6/17/2020

NAD83 TX S CENTRAL

September 16, 2020 REV3

Original Issue Date: May 14, 2020

RE: Proposed Uncased League City Road Pipeline Crossing – Bayport to Markham Pipeline

To Whom It May Concern,

This letter is to provide specific technical and engineering information with respect to the proposed uncased League City road crossings by the 12-inch diameter Bayport to Markham Pipeline to be constructed by Baymark Pipeline LLC (Enterprise). The information provided herein is intended to provide a design basis discussion for a variance request to allow uncased crossings of the League City Roads.

Mechanical Design

The Bayport to Markham 12-inch Pipeline, including the crossing referenced above, is designed to both 49 CFR Part 195 and ASME B31.4. The depth of cover at the League City road crossings will be consistent with Section 42-383 (d) of the City's Pipeline Ordinance and shall be buried a minimum of seven feet (7') below the lowest point of the road pavement.

The pipe to be used for the uncrossed casing is API-5L-X60 PSL2 with a minimum specified yield strength (SMYS) of 60,000 psi. The wall thickness is specified as 0.472 inches for bored crossings. The pipe will be externally coated with 14 - 22 mils of fusion bonded epoxy (FBE) and additional 30-40 mils of abrasion resistant overcoat (ARO). In addition, the pipe will be hydrostatically tested, and all field welds will be radiographically tested and coated before installation.

The design Maximum Operating Pressure (MOP) of the pipeline is 2,160 psig. Using the internal design pressure per 49 CFR Part 195.106;

$$P = (2 St/D) \times E \times F, \text{ where}$$

P = Internal design pressure in psi gage (psig).

S = Yield strength in pounds per square inch.

t = Nominal wall thickness of the pipe in inches.

D = Nominal outside diameter of the pipe in inches.

E = Seam joint factor determined in accordance with paragraph (e) of this section.

F = A design factor of 0.72, except that a design factor of 0.60 is used for pipe, including risers, on a platform located offshore or on a platform in inland navigable waters, and 0.54 is used for pipe that has been subjected to cold expansion to meet the specified minimum yield strength

and is subsequently heated, other than by welding or stress relieving as a part of welding, to a temperature higher than 900 °F (482 °C) for any period of time or over 600°F (316°C) for more than 1 hour.

From the formula $P = (2 St/D) \times E \times F$, the specific values for this pipeline are:

P = Internal design pressure in psig
 S = 60,000 lb/in²
 t = 0.472 in
 D = 12.750 in
 E = 1.00
 F = 0.72

From the design formula, using the project specific values above, $P = 3,198.5$ psig. This is 1,038.5 psi higher than the pipeline design MOP of 2,160 psig. Although a pipe wall thickness of 0.3188 inches would satisfy the design requirements for an MOP of 2,160 psig, a wall thickness of 0.472 inches is being used in the crossing design, which represents a wall thickness 48% greater than that required to satisfy the internal design pressure formula.

The pressure required to produce 100% SMYS in the 12-inch diameter, X60, 0.472" wall thickness pipe is 4,442.36 psig. The MOP of the pipeline is 2,160 psig. Therefore, the pipeline operating at MOP will experience a hoop stress of 48.6% of its Specified Minimum Yield Strength (SMYS). Included in this submittal is a calculation summary sheet for the API 1102 loading calculations for steel pipelines crossing roads.

An excerpt from PHMSA Interpretation #PI-75-036 states that "The minimum Federal safety standards for transportation by pipeline are 49 CFR Part 192, Transportation of Natural and Other Gas by Pipeline, and 49 CFR Part 195, Transportation of Liquids by Pipeline. Neither of these regulations require that casings be used. However, Section 195.256, crossing of railroads and highways, of the liquid regulations requires such crossings to be installed so as to adequately withstand the dynamic forces exerted by anticipated traffic loads." The Bayport to Markham pipeline crossings are designed accordingly and in compliance with all applicable Part 195 regulations.

Corrosion Control

External and internal corrosion control measures are also designed into the pipeline system. A basic overview of these measures is as follows:

1. The Bayport to Markham pipeline will be protected externally by fusion bonded epoxy coating and impressed current cathodic protection systems. The cathodic protection system locations will be determined once the pipeline is physically installed and will be in compliance with Title 49 CFR Part 195, Subpart H – Corrosion Control.
2. Rectifiers will be monitored\checked every 60 days to ensure proper operations of rectifier units.
3. Test Stations will be placed approximately every mile to monitor effectiveness of cathodic protection system.

4. The internal corrosion will be monitored via internal corrosion points at sales\delivery points on the line.

An additional reason for requesting an uncased crossing is the potential for external pipeline corrosion that can result from cathodic protection shielding.

When cased pipeline crossings were widely accepted as sound industry practice, they were designed for two specific purposes. First, to protect the carrier pipe from increased external load forces typically encountered at road crossings; and second, in the event that the pipeline does develop a leak under a road or railroad, the casing and casing vents would vent the released product away from the road or rail bed. Additionally, it was thought that a section of cased pipeline would be easier to replace than uncased pipe. However, this is not necessarily accurate.

Some inherent problems associated with cased crossings include:

1. Pipeline casings are designed to be electrically isolated from the carrier pipe and as such do not receive cathodic protection (CP) current from the pipeline's CP system. Consequently, by being isolated from the carrier pipe and cathodic protection system, the casing will naturally corrode or may corrode very rapidly by stray current interference received from the pipeline cathodic protection system. In either case, the casing can no longer provide the load bearing protection or vent the released product away from the road bed as it was originally designed to do.
2. If a leak in the casing occurs, ground water and sediment are allowed into the casing annulus creating a corrosive environment around the carrier pipe. This situation can result in aggressive corrosion since the amount of water and sediment is ever-changing with season weather patterns\rain fall and soil moisture content (also see item 3 below). Water can also enter the casing at the casing carrier pipe end seals. Although there have been technological advancements in end seal products, due to soil expansion and contraction, and pipeline settlement and vibrations, the seal is often breached thus allowing water and sediment to enter the casing.
3. Unfortunately, the casings that were historically designed to protect the pipeline actually shield the cathodic protection current from the carrier pipe thus leaving it to corrode freely when water and or sediment enters the casing annulus in one of the above described manners.
4. Industry case histories have also identified additional forms of accelerated corrosion at or near the carrier pipe to casing end seals. Most commonly referred to as oxygen concentration\differential aeration cells or ion concentration cells. This rapid form of corrosion occurs due to variations in concentrations of oxygen or soil moisture content (ion concentration) inside the casing versus what is directly adjacent and outside the casing. In this scenario, a direct result of having a casing in place.
5. In the event that a casing becomes electrically shorted to the carrier pipe, most normally due to soil expansion, contraction or pipeline settlement that allows the casing to touch\contact the carrier pipe, the uncoated casing acts as a large current drain to the pipeline's cathodic protection system. This current drain can rob valuable current that was intended to protect the carrier pipe. Such an event, if undetected, can leave the carrier pipe unprotected thus allowing it to corrode and possibly leak.

The overall point is that not only can the addition of a casing hinder or prevent the protection of the carrier pipe from corrosion by common prevention techniques (i.e. cathodic protection), but it can actually create a corrosive environment, via shielding, electrical short circuits and/or various corrosion concentration cells.

Based on the information found in the various professional reviews of encased steel pipelines, Baymark Pipeline LLC is averse to installing casing whenever a practical and justified alternative is present. It is the opinion of Baymark that the proposed uncased crossing with a minimum of sixty inches (60") lower than the lowest part of the drainage or bar ditch and a minimum of seven feet (7') below the lowest point of the road pavement and installed with pipe meeting the pipeline specifications described in this letter will allow for safe operation of the proposed pipeline.

It is my opinion that the design of the pipeline is consistent with both the letter and intent of the governing codes 49 CFR 195 and ASME B31.4, and that the design provides a voluntary level of safety that exceeds that which is required by these codes.

Sincerely,



Daniel R. Alcorn, P.E.
NC NorthStar Energy Services, Inc.
Texas PE #79234
Firm Registration No. F-14939



9/16/20

Enclosures/References:

1. API Calculations
2. PHMSA Interpretation #PI-75-036

September 16, 2020, REV3
Original Issue Date: May 14, 2020

RE: Proposed Uncased League City Road Pipeline Crossing – Webster to Braskem Pipeline

To Whom It May Concern,

This letter is to provide specific technical and engineering information with respect to the proposed uncased League City road crossings by the 8-inch diameter Webster to Braskem Pipeline to be constructed by South Texas NGL Pipeline, LLC (Enterprise). The information provided herein is intended to provide a design basis discussion for a variance request to allow uncased crossings of the League City Roads.

Mechanical Design

The Webster to Braskem 8-inch Pipeline, including the crossing referenced above, is designed to both 49 CFR Part 195 and ASME B31.4. The depth of cover at the League City road crossings will be consistent with Section 42-383 (d) of the City's Pipeline Ordinance and shall be buried a minimum of seven feet (7') below the lowest point of the road pavement.

The pipe to be used for the uncrossed casing is API-5L-X60 PSL2 with a minimum specified yield strength (SMYS) of 60,000 psi. The wall thickness is specified as 0.322 inches for bored crossings. The pipe will be externally coated with 14 - 22 mils of fusion bonded epoxy (FBE) and additional 30-40 mils of abrasion resistant overcoat (ARO). In addition, the pipe will be hydrostatically tested, and all field welds will be radiographically tested and coated before installation.

The design Maximum Operating Pressure (MOP) of the pipeline is 2,220 psig. Using the internal design pressure per 49 CFR Part 195.106;

$$P = (2 St/D) \times E \times F, \text{ where}$$

P = Internal design pressure in psi gage (psig).

S = Yield strength in pounds per square inch.

t = Nominal wall thickness of the pipe in inches.

D = Nominal outside diameter of the pipe in inches.

E = Seam joint factor determined in accordance with paragraph (e) of this section.

F = A design factor of 0.72, except that a design factor of 0.60 is used for pipe, including risers, on a platform located offshore or on a platform in inland navigable waters, and 0.54 is used for pipe that has been subjected to cold expansion to meet the specified minimum yield strength

and is subsequently heated, other than by welding or stress relieving as a part of welding, to a temperature higher than 900 °F (482 °C) for any period of time or over 600°F (316°C) for more than 1 hour.

From the formula $P = (2 St/D) \times E \times F$, the specific values for this pipeline are:

P = Internal design pressure in psig

S = 60,000 lb/in²

t = 0.322 in

D = 8.625 in

E = 1.00

F = 0.72

From the design formula, using the project specific values above, $P = 3,225.6$ psig. This is 1,005.6 psi higher than the pipeline design MOP of 2,220 psig. Although a pipe wall thickness of 0.2216 inches would satisfy the design requirements for an MOP of 2,220 psig, a wall thickness of 0.322 inches is being used in the crossing design, which represents a wall thickness 45% greater than that required to satisfy the internal design pressure formula.

The pressure required to produce 100% SMYS in the 8-inch diameter, X60, 0.322" wall thickness pipe is 4,480.0 psig. The MOP of the pipeline is 2,220 psig. Therefore, the pipeline operating at MOP will experience a hoop stress of 49.6% of its Specified Minimum Yield Strength (SMYS). Included in this submittal is a calculation summary sheet for the API 1102 loading calculations for steel pipelines crossing roads.

An excerpt from PHMSA Interpretation #PI-75-036 states that "The minimum Federal safety standards for transportation by pipeline are 49 CFR Part 192, Transportation of Natural and Other Gas by Pipeline, and 49 CFR Part 195, Transportation of Liquids by Pipeline. Neither of these regulations require that casings be used. However, Section 195.256, crossing of railroads and highways, of the liquid regulations requires such crossings to be installed so as to adequately withstand the dynamic forces exerted by anticipated traffic loads." The Bayport to Markham pipeline crossings are designed accordingly and in compliance with all applicable Part 195 regulations.

Corrosion Control

External and internal corrosion control measures are also designed into the pipeline system. A basic overview of these measures is as follows:

1. The Webster to Braskem pipeline will be protected externally by fusion bonded epoxy coating and impressed current cathodic protection systems. The cathodic protection system locations will be determined once the pipeline is physically installed and will be in compliance with Title 49 CFR Part 195, Subpart H – Corrosion Control.
2. Rectifiers will be monitored/checked every 60 days to ensure proper operations of rectifier units.
3. Test Stations will be placed approximately every mile to monitor effectiveness of cathodic protection system.

4. The internal corrosion will be monitored via internal corrosion points at sales\delivery points on the line.

An additional reason for requesting an uncased crossing is the potential for external pipeline corrosion that can result from cathodic protection shielding.

When cased pipeline crossings were widely accepted as sound industry practice, they were designed for two specific purposes. First, to protect the carrier pipe from increased external load forces typically encountered at road crossings; and second, in the event that the pipeline does develop a leak under a road or railroad, the casing and casing vents would vent the released product away from the road or rail bed. Additionally, it was thought that a section of cased pipeline would be easier to replace than uncased pipe. However, this is not necessarily accurate.

Some inherent problems associated with cased crossings include:

1. Pipeline casings are designed to be electrically isolated from the carrier pipe and as such do not receive cathodic protection (CP) current from the pipeline's CP system. Consequently, by being isolated from the carrier pipe and cathodic protection system, the casing will naturally corrode or may corrode very rapidly by stray current interference received from the pipeline cathodic protection system. In either case, the casing can no longer provide the load bearing protection or vent the released product away from the road bed as it was originally designed to do.
2. If a leak in the casing occurs, ground water and sediment are allowed into the casing annulus creating a corrosive environment around the carrier pipe. This situation can result in aggressive corrosion since the amount of water and sediment is ever-changing with season weather patterns\rain fall and soil moisture content (also see item 3 below). Water can also enter the casing at the casing carrier pipe end seals. Although there have been technological advancements in end seal products, due to soil expansion and contraction, and pipeline settlement and vibrations, the seal is often breached thus allowing water and sediment to enter the casing.
3. Unfortunately, the casings that were historically designed to protect the pipeline actually shield the cathodic protection current from the carrier pipe thus leaving it to corrode freely when water and or sediment enters the casing annulus in one of the above described manners.
4. Industry case histories have also identified additional forms of accelerated corrosion at or near the carrier pipe to casing end seals. Most commonly referred to as oxygen concentration\differential aeration cells or ion concentration cells. This rapid form of corrosion occurs due to variations in concentrations of oxygen or soil moisture content (ion concentration) inside the casing versus what is directly adjacent and outside the casing. In this scenario, a direct result of having a casing in place.
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The overall point is that not only can the addition of a casing hinder or prevent the protection of the carrier pipe from corrosion by common prevention techniques (i.e. cathodic protection), but it can actually create a corrosive environment, via shielding, electrical short circuits and/or various corrosion concentration cells.

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It is my opinion that the design of the pipeline is consistent with both the letter and intent of the governing codes 49 CFR 195 and ASME B31.4, and that the design provides a voluntary level of safety that exceeds that which is required by these codes.

Sincerely,



Daniel R. Alcorn, P.E.
NC NorthStar Energy Services, Inc.
Texas PE #79234
Firm Registration No. F-14939



9-16-20

Enclosures\References:

1. API Calculations
2. PHMSA Interpretation #PI-75-036

Fw: Baymark Pipeline/South Texas NGL Pipelines fence slats

Ethan Rogers <ethan.rogers@percheronllc.com>

Tue 9/15/2020 4:49 PM

To: Popp, Chelsea <cmpopp@eprod.com>; Patty Riddels <patty.riddels@percheronllc.com>

Cc: Lee Harugthy <lee.harugthy@percheronllc.com>

Chelsea/Pay ,

Please see the email below from the owner of 310 Amber Lane (Mr. Joe Camarata) in League city, this email should be sufficient to address Mr. Linenschmidt's concerns and be included in the SUP.

Thanks,

Ethan Rogers



Project Manager | Percheron

3121 Nichols Ave

Bay City, TX 77414

Cell: (479) 774-1278

Office: (979) 943-2221

ethan.rogers@percheronllc.com

From: Joseph Camarata <josephcamarata@gmail.com>

Sent: Tuesday, September 15, 2020 4:29 PM

To: Ethan Rogers <ethan.rogers@percheronllc.com>; Joseph Camarata <josephcamarata@gmail.com>

Subject: Re: Baymark Pipeline/South Texas NGL Pipelines fence slats

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Mr. Rogers

I want to thank both companies for being considerate to the Amber Lane neighborhood and especially my residence in the installation of the green fence slat material on both pipeline enclosures exposed to my backyard. I am in agreement of the material selection and would like the option for the material to be installed vertically as shown in the picture sent or at a 45 degree angle. Please advise if you have any questions, If not please consider this discussion complete on this issue. Thank you in advance

Joe Camarata
310 Amber Lane
League City, TX 77573

On Tue, Sep 15, 2020 at 3:44 PM Ethan Rogers <ethan.rogers@percheronllc.com> wrote:

Mr. Joseph,

Thank you talking the me t o speak with me today. Per our conversaon, **HSC Pipeline Partnership** (owner of the exisng valve sit e located behind your house) and **Baymark Pipeline LLC/South Texas NGL Pipelines, LLC** (who will be construcng one ne w valve site in the same area) have all agree to install green chain link fence slats in new site as well as the exisng. The y will look something like the picture below, and this will take place during the construcon of the Ba ymark/South Texas site in the next few months. I will also be your point of contact during the construcon phase, so don't hesit ate to reach out with any issues.



Thanks,

Ethan Rogers



Project Manager | Percheron

3121 Nichols Ave

Bay City, TX 77414

Cell: (479) 774-1278

Office: (979) 943-2221

ethan.rogers@percheronllc.com

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Fw: Pump station/pipeline awareness

Ethan Rogers <ethan.rogers@percheronllc.com>

Wed 9/23/2020 8:09 AM

To: Patty Riddels <patty.riddels@percheronllc.com>; Popp, Chelsea <cmpopp@eprod.com>

Cc: Lee Harugthy <lee.harugthy@percheronllc.com>

Patty, Below is the email chain for the landowner at 300 Amber Lane.

Thanks,

Ethan Rogers

**Project Manager | Percheron**

3121 Nichols Ave

Bay City, TX 77414

Cell: (479) 774-1278

Office: (979) 943-2221

ethan.rogers@percheronllc.com

From: Mike Rapley <mrapley@comcast.net>

Sent: Tuesday, September 22, 2020 4:46 PM

To: Ethan Rogers <ethan.rogers@percheronllc.com>

Subject: Re: Pump station/pipeline awareness

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Thank you Ethan. Appreciate your feedback.

Mike

Sent from my iPhone

On Sep 22, 2020, at 4:13 PM, Ethan Rogers <ethan.rogers@percheronllc.com> wrote:

Mike,

Thank you for your email, I would like to start by clarifying that what will be installed is not a Pump Station but will be a Valve site (much smaller than Pump Station). To address the visibility concern, both companies have agreed to install chain Link fence slats (green) in the new fence that will surround the site as well as the existing Enterprise site. You and I have

also discussed options to improve your personal fence to reduce the visibility of the site from your residence.

The valve site was placed in this location because the fee landowner (CenterPoint) requested that we keep new sites as close to existing valves as possible, while keeping the sites as far away from any CenterPoint assets (Towers) as possible. Placing this on the south side of the of the existing site meets both these requests. The current site location is already acquired from CenterPoint. You will not be at any additional risk with the site in this location, you could argue that there is less risk because the valve could be closed in case of an emergency. This valve site is required by DOT / Texas Railroad Commission as a block valve for Clear Creek, there will be similar valve on the north side of Clear Creek in Webster.

I will be your point of contact during construction for these projects, once we have solid start date, I will keep you updated on the scheduling and progress.

Please let me know if you have any additional questions or concerns, and I will be happy to discuss.

Thanks,

Ethan Rogers

<Outlook-2iffsiwy.png>

Project Manager | Percheron

3121 Nichols Ave

Bay City, TX 77414

Cell: (479) 774-1278

Office: (979) 943-2221

ethan.rogers@percheronllc.com

From: Mike Rapley <mrapley@comcast.net>

Sent: Tuesday, September 22, 2020 10:06 AM

To: Ethan Rogers <ethan.rogers@percheronllc.com>

Subject: Pump station/pipeline awareness

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Evening Ethan,

Apologies on the delay as our family has a lot on their plate at the moment. Per our discussions earlier as well as the recommendation from Mark Llnenschmidt (Senior planner for League City) this email serves as acknowledgment you reaching out to us regarding the pipeline (and specifically the pump station) scheduled to be installed directly behind our home on 300 Amber Lane. We have been having discussions about associated risk, strategies to minimize visibility of the pump station, and overall schedule. One question we do have still is why this station has to be installed directly behind our home vs installing it either behind the empty lot (2 lots to the north of 300 Amber Lane) or closer to 518.

Additionally, it would be useful for any associated risks of having the pump station behind the house documented via email. Thank you for reaching out to us and look forward to continued conversations.

Respectfully,
Mike Rapley

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