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

Before you start, remember:

- 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 in POPS. Permit applications include Renewals, New Permits, Inactivates, Amendments, and Transfers.

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.

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

Fill out the **OPERATOR INFORMATION** section to the best of your ability.

OPERATOR INFORMATION

Operator Name

Operator Agent Name

P-5 Number

T-4 Permit Number

Date

This section is required.

NOTE: The P-5 Number and T-4 Permit Number fields have character limits to ensure that accurate information is provided.

Once finished, continue to the next section.

APPLICATION TYPE

Identify whether this Form C-LTR POPS Cover Letter is being filed for a Renewal, New Permit, Inactivate, Amendment, or Transfer, and specify whether eminent domain has ever been declared for any pipelines under the permit being filed for. This section is required.

APPLICATION TYPE

Was eminent domain ever declared for this permit? Yes ☐ No ☐

☐ Renewal   ☐ New Permit   ☐ Inactivate   ☐ Amendment / Transfer

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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.

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 Mileage Being Renewed

Fill out this section to the best of your ability. The Total Active Mileage Being Renewed should include all active mileage being renewed for the permit.

NEW PERMIT

The **NEW PERMIT** section should *only* be filled out if the **APPLICATION TYPE** is New Permit.

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.

Total Active New Permit Mileage

Is this New Permit application associated with a transfer? ☐ Yes (fill out Form T-4B and attach in POPS) ☐ No

Fill out this section to the best of your ability. 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.

INACTIVATE

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

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 according to TAC §8 and 49 CFR §192-195, merged into another permit, or any other circumstance.

Total Active Mileage Being Inactivated

Are the pipelines being abandoned in place, merged into another permit, or something else?

☐ Abandoned in Place   ☐ Merged into Permit Number [   ]   ☐ Other (*specify in Additional Comments section on page 3*)

Pipelines may only be abandoned in place if they have no intention for future use. If a line is merely idle, it cannot be abandoned via an Inactivate permit application.

If you are merging all pipelines on one or more permits into another permit, you must Inactivate the divesting permit(s). List the acquiring permit number in the subsequent field.

You should only use the Other (specify) option if you have obtained approval from the Commission regarding this Inactivate permit application. Use the **ADDITIONAL INFORMATION** section on page 3 to specify the reason for this Inactivate permit application.

AMENDMENT

The **AMENDMENT / TRANSFER** section should *only* be filled out if the **APPLICATION TYPE** is Amendment or Transfer.

AMENDMENT / TRANSFER

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 you are reporting a Transfer (Divesting or Acquiring), make sure to also fill out Form T-4B. *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…

The list of amendment changes (T4_AMD codes) starts on Page 2 of the form.

PA: Pipeline Addition (assigned to pipeline segments that need to be added to the permit)

Mileage being added

BP: Abandoned in Place (assigned to pipeline segments that have been completely abandoned)

Mileage being abandoned

FC: Fluid Change (assigned to pipeline segments that have had a change in product)

Mileage being changed

OM: Other Modification (assigned to pipeline segments that have attribute and/or geometry updates)
Must specify which PLINE_ID's are being updated to TX_REG = N and why in the Additional Information section on page 3.
Mileage box to the right is to indicate the +/- change in total active mileage.

Change in total active mileage (+/-)

DP: Delete Pipeline (assigned to pipeline segments to be deleted from permitting and mapping)
Must specify which PLINE_IDs are being deleted and why in the Additional Information section below

Mileage being deleted

FT: Full Transfer (assigned to pipeline segments being fully transferred to/from a different P-5)
Divesting   Acquiring

Mileage being transferred

PT: Partial Transfer (assigned to pipeline segments being partially transferred to/from a different P-5)
Divesting   Acquiring

Mileage being transferred

List all permits being partially divested or acquired…

PM: Partial Merge (assigned to pipeline segments being partially merged within the same P-5)
Divesting   Acquiring

Mileage being merged

List all permits being partially divested or acquired…

MP: Merge Permits (assigned to pipeline segments being consolidated within the same P-5)

Mileage being merged

List all permits being merged in…

TM: Transfer Merge (assigned to pipeline segments being acquired and merged from a full transfer)

Mileage being merged

List all permits being merged in…

Multiple amendment changes can be reported on one application. Some combinations of amendment changes cannot be reported together in one permit application (such as FT: Full Transfer and PT: Partial Transfer) and will force a rejection from the Commission when the permit application is reviewed.

- PA: Pipeline Addition is used to report new pipeline additions to an existing permit. Can only be used to report a positive Mileage Change.
- BP: Abandoned in Place is used to report pipelines that have been abandoned in place

according to TAC §8 and 49 CFR §192-195. Can only be used to report a negative Mileage Change.

- FC: Fluid Change is used to report a change in a pipeline's product, such as a change from crude oil to carbon dioxide.
- TM: Transfer Merge is used to report the acquisition of one or more full permits from a divesting Operator. The acquired permit(s) will be merged into one of your existing permits. Can only be used to report a positive Mileage Change. Requires Form T-4B.
- MP: Merge Permits is used to report the consolidation of multiple permits within your company. You must also file an Inactivate permit application for all consolidated permits. Can only be used to report a positive Mileage Change.
- PT: Partial Transfer is used to report the transfer of part of a pipeline system to or from a different Operator. Can be used to report either an acquisition or a divestiture and can be used to report either a positive or negative Mileage Change. Requires Form T-4B.
- PM: Partial Merge is used to report the transfer of part of a pipeline system within your company. Can be used to report either a positive or negative Mileage Change.
- OM: Other Modification is used to report any other changes that are not covered in the rest of the T4_AMD codes. Can be used to report either a positive or negative Mileage Change, or no Mileage Change if the amendment change is for informational purposes only.
- DP: Delete Pipeline is used to remove a pipeline from an existing permit. Can only be used to report a negative Mileage Change.
- 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 and can be used to report either a positive or negative Mileage Change. Requires Form T-4B.

If the amendment is for MP: Merge Permits, list all the permit numbers that are being merged in this permit application.

If this PM: Partial Merge is reporting the acquisition of permits, list all the divesting permits. If this PM: Partial Merge is reporting the divestiture of permits, list all the acquiring permits.

If this PT: Partial Transfer is reporting the acquisition of permits, list all the divesting permits. If this PT: Partial Transfer is reporting the divestiture of permits, list all the acquiring permits.

If this FT: Full Transfer is reporting the acquisition of permits, list all the divesting permits. If this PT: Partial Transfer is reporting the divestiture of permits, list all the acquiring permits.

If the amendment is for DP: Delete Pipeline, you must specify why the line is being removed from the permitting and mapping in the Additional Information section on page 3.

If the amendment is for OM: Other Modification, you must specify what this Other Modification is in the Additional Information section on page 3.

NOTE: Common OM: Other Modification reasons include diameter changes, pipeline system name changes, and slight changes to pipeline geometry or location.

Total Active Mileage Before Amendment Changes

Total Active Mileage After Amendment Changes

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 them to the permit's Total Active Mileage Before Amendment Changes to calculate the 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.

ADDITIONAL INFORMATION

Provide any other information that relates to the permit application…