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August 31, 2011

California High-Speed Rail Authority
Merced to Fresno Draft EIR/EIS Comments
770 L Street, Suite 800
Sacramento, CA 95814

Subject: **Comments on the Draft EIR/EIS California High-Speed Rail Segment: Merced to Fresno Segment**
Chevron Environmental Management Company
Historical Pipeline Portfolio–Bakersfield to Richmond

To Whom It May Concern:

Chevron Environmental Management Company (CEMC) recently reviewed the Draft Environmental Impact Report/Statement (EIR/EIS) for the proposed California High-Speed Rail (HSR): Merced to Fresno Segment. The purpose of this letter is to notify the California HSR Authority and stakeholders as to the location of a formerly active crude-oil pipeline located in the Fresno area (Figure 1), and to provide background information about the former pipeline. The intent is that information regarding the location and construction of this former pipeline will be incorporated into future planning and engineering documents associated with the proposed California HSR: Merced to Fresno Segment.

A portion of the former Tidewater Associated Oil Company (TAOC) pipeline existed within the Fresno footprint of the proposed California HSR: Merced to Fresno Segment (Figure 1). The historic pipeline was constructed in the early 1900s and carried crude oil from the southern San Joaquin Valley to the Bay Area. Pipeline operations for the TAOC ceased in the 1970s.

The pipeline was originally installed at depths ranging from 18 inches to 10 feet below ground surface. The steel pipeline was typically encased in a protective coating composed of coal tar and asbestos-containing felt material (ACM). When pipeline operations ceased, the pipeline was taken out of commission. The degree and method of decommission varied; in some instances the pipeline was removed, while in others it remains in place. It should be noted that the TAOC pipeline is not included in the Underground Service Alert-North (USA-North) system as it is not an active pipeline.

Evidence of historical releases associated with the former TAOC pipeline is sometimes identified during the course of underground utility work and other subsurface construction activities near the former pipeline right of way (ROW). Residual weathered crude oil associated with former 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 historical release of crude oil from the pipeline is non-hazardous.

Figures 1 through 4 illustrate the location of the former TAOC ROW within the proposed footprint of the California HSR project in Fresno, as shown in the Draft EIR/EIS. CEMC understands that there are several construction options being evaluated as part of the Draft EIR/EIS. To facilitate incorporation of the information contained within this letter into project planning and engineering documents, CEMC can provide Geographic Information System pipeline location files to project planners upon request.

CEMC recommends that the California HSR Authority be prepared to potentially address residual weathered crude oil, pipeline, and ACM from the former TAOC system during subsurface construction activities conducted in proximity to the former pipeline ROW. This potentiality is easily managed with some advanced planning. CEMC would appreciate being informed of any encountered petroleum, pipeline, and pipeline-related ACM in the vicinity of the former TAOC ROW.

For more information regarding this historic pipeline, please visit http://www.hppinfo.com/. If you have any questions, require additional information, or would like to request more detailed maps, please contact SAIC consultants Tom Burns (thomas.a.burns@saic.com) at (916) 979-3748 or Daniel Anzelon (daniel.b.anzelon@saic.com) at (858) 826-3316.

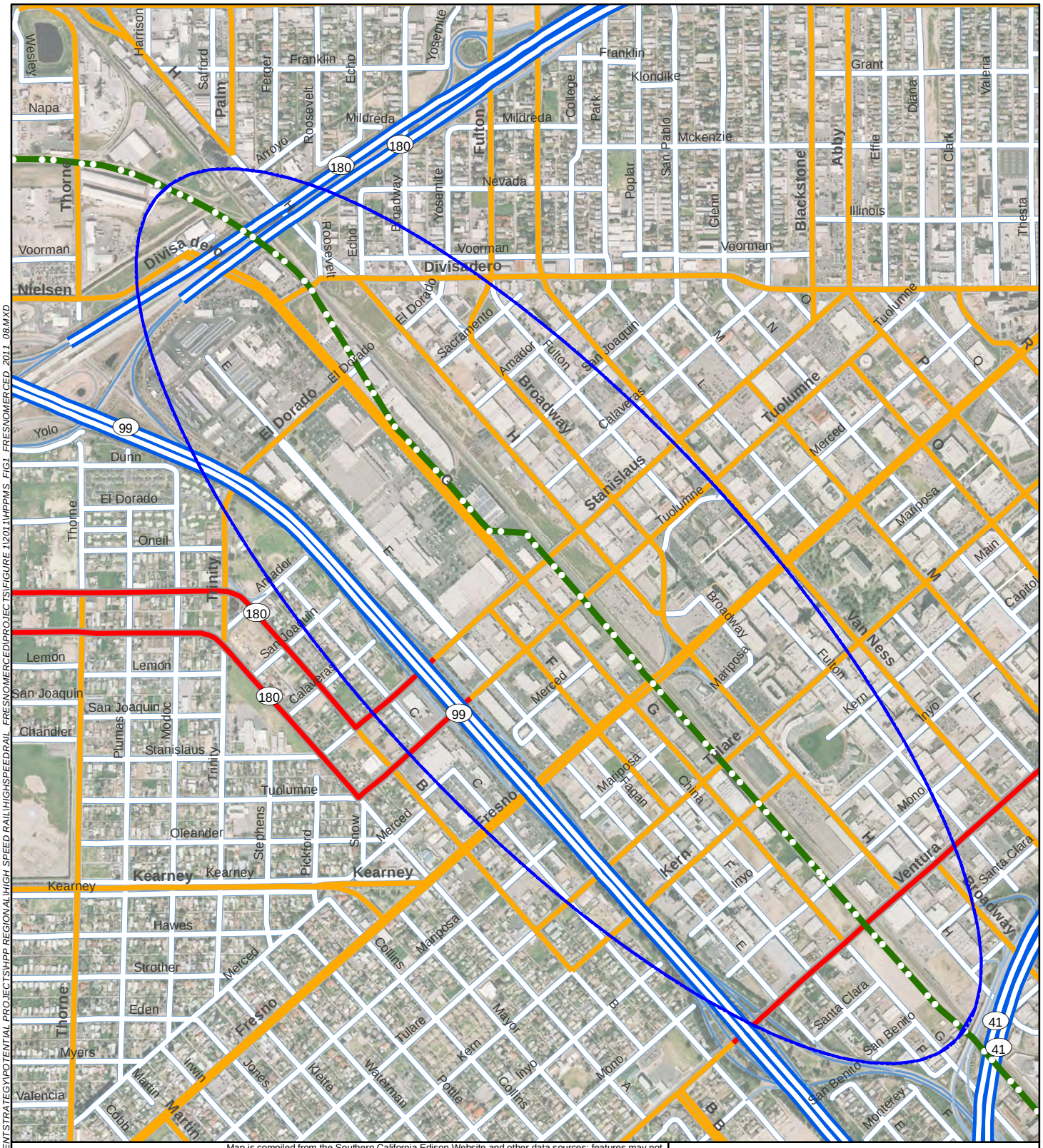
Sincerely,

Mike Oliphant

MO/klg

Enclosures:
Figure 1. Area Map – California High-Speed Rail Project – Fresno Project Footprint
Figure 2. Area Map – California High-Speed Rail Project – Fresno Project Footprint
Figure 3. Area Map – California High-Speed Rail Project – Fresno Project Footprint
Figure 4. Area Map – California High-Speed Rail Project – Fresno Project Footprint

cc: Mr. Tom Burns – SAIC
3800 Watt Avenue, Suite 210, Sacramento, California 95821
Mr. Mike Hurd – SAIC (letter only)
1000 Broadway, Suite 675, Oakland, California 94607



Map is compiled from the Southern California Edison Website and other data sources; features may not be displayed in exact relationship to one another. Do not rely on map for legal information or underground work.

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Feet

Historical Tidewater Associated Oil Company (TAOC) Pipeline

Fresno Project Footprint

CALIFORNIA LOCATION MAP

Area Map

California High-Speed Rail Project
Fresno Project Footprint

DATE: 8/16/2011	ANALYST: BURNSTH	FIGURE:
SAIC		1

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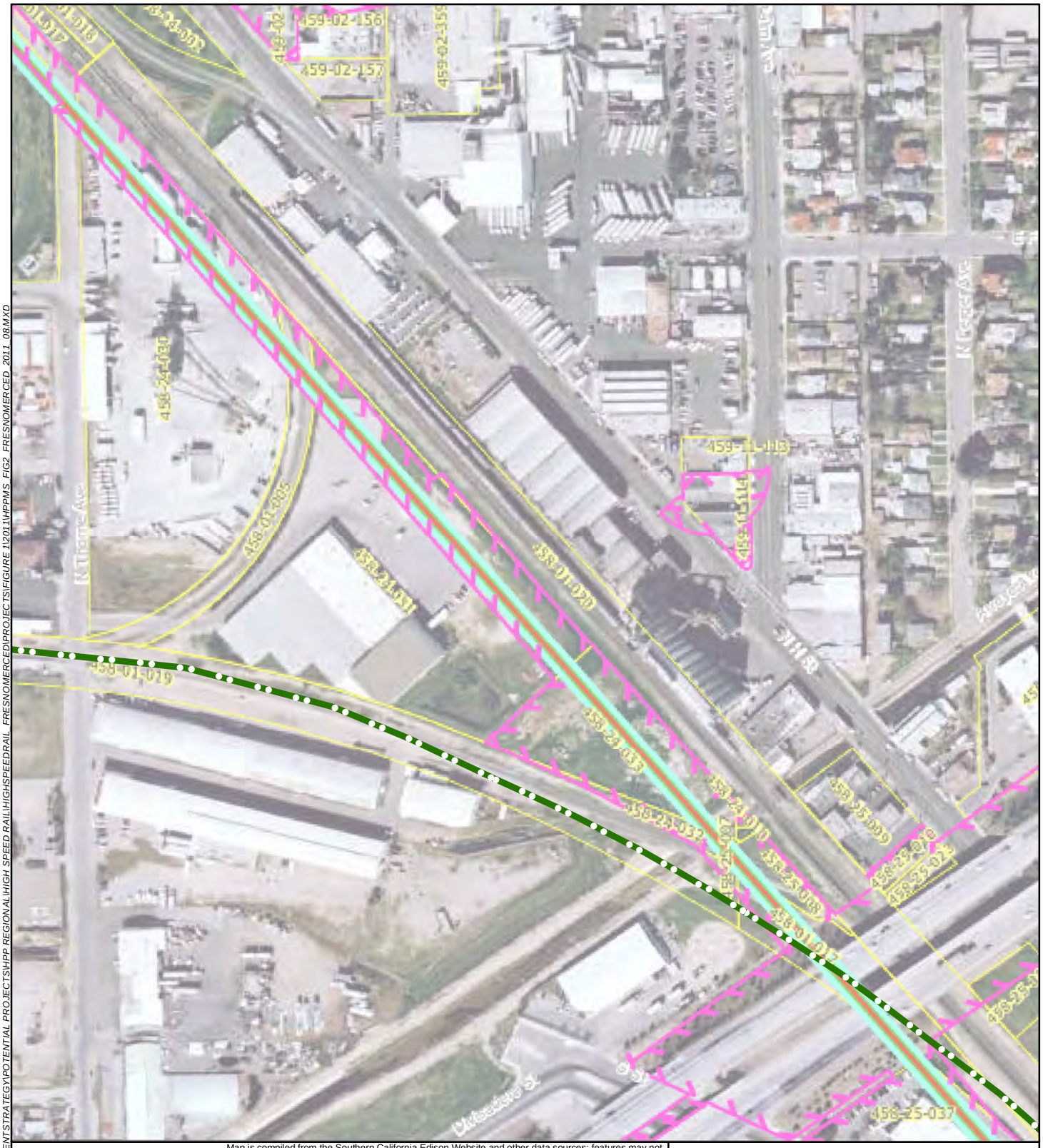

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Historical Tidewater Associated Oil Company (TAOC) Pipeline

Project Footprint

Parcel Boundary

BNSF Alternative

Hybrid Alternative

CALIFORNIA LOCATION MAP

Area Map

California High-Speed Rail Project
Fresno Project Footprint

DATE: 8/16/2011 | ANALYST: BURNSTH | FIGURE: 2

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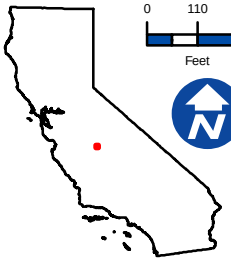

CALIFORNIA LOCATION MAP

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Area Map

California High-Speed Rail Project
Fresno Project Footprint

DATE: 8/16/2011	ANALYST: BURNSTH	FIGURE:
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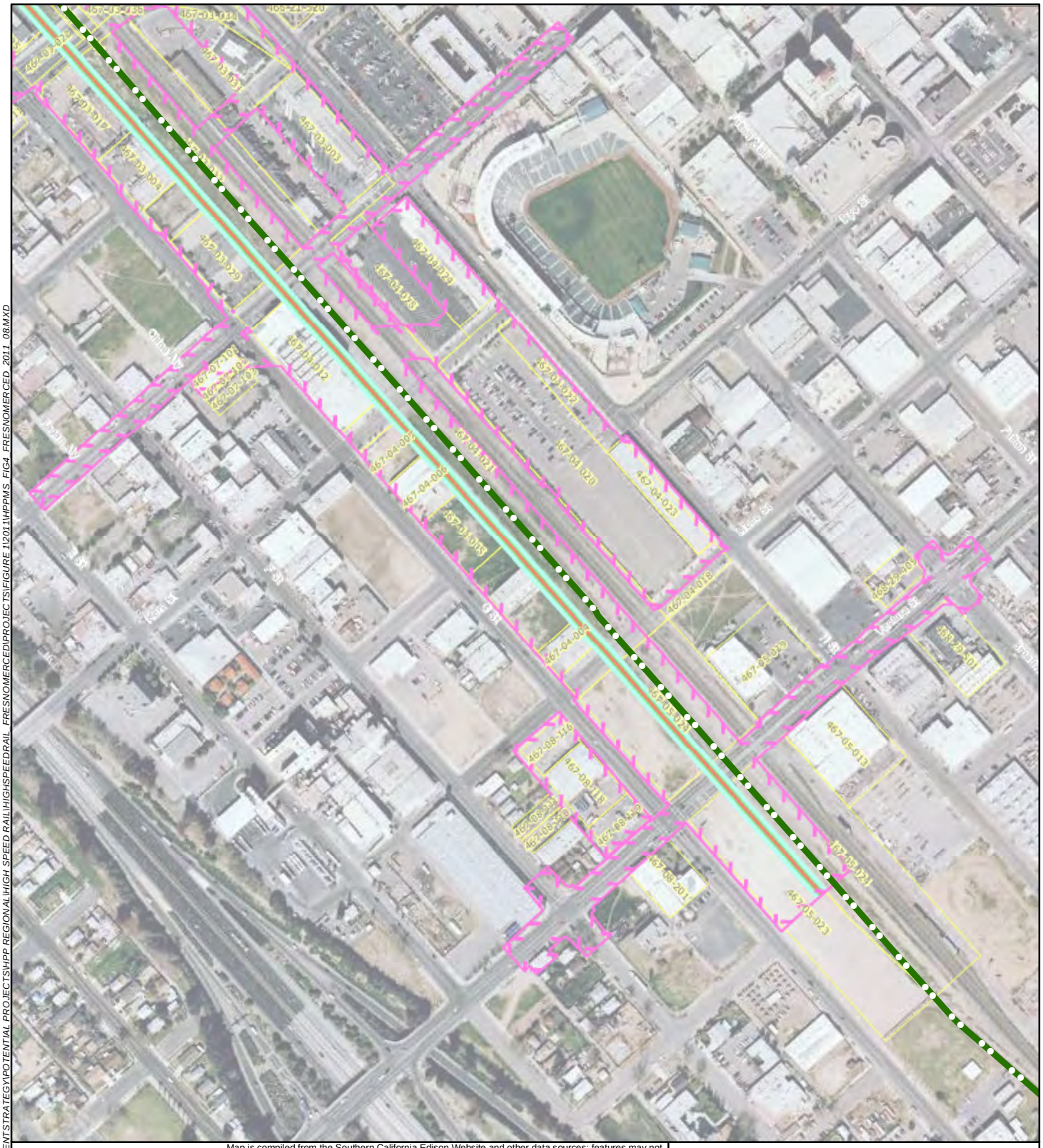

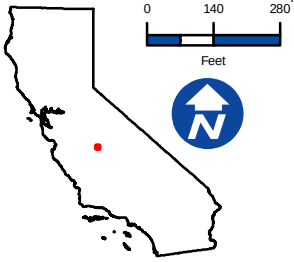

CALIFORNIA LOCATION MAP

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Historical Tidewater Associated Oil Company (TAOC) Pipeline

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California High-Speed Rail Project
Fresno Project Footprint

DATE: 8/16/2011	ANALYST: BURNSTH	FIGURE:
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