

ATTACHMENT B

OUTLINE OF SCOPE OF WORK PROPOSED PLAN TO ABANDON 4" PIPELINE AT PADRE ISLAND NATIONAL SEASHORE TEXAS EASTERN TRANSMISSION CORPORATION April 30, 1994

This scope of work outline assumes that a Plan of Operations for this pipeline (see Attachment A) will be completed prior to, or concurrent with, submittal of this plan for abandonment. Effort has been made to minimize duplication of work that would be performed for preparation of the Plan of Operations.

I. OWNERSHIP INFORMATION

- A. Provide name, address, and telephone number of the following:
 - 1. Pipeline owner;
 - 2. Pipeline operator;
 - 3. Person accountable for operations;
 - 4. Field representative; and
 - 5. Contact person in case of spill, emergency, etc.
- B. Provide copies of the following:
 - 1. Ownership documentation;
 - 2. Designation of operator;
 - 3. Designation of agent;
 - 4. Right-of-way agreements; and
 - 5. Other pertinent agreements.

II. MAPS

- A. Rights-of-way:
 - 1. Provide survey plat or other equivalent data to pinpoint locations of rights-of-way;
 - 2. Identify rights-of-way on USGS quadrangle map(s), 1:24,000 scale.
- B. Location Maps:
 - 1. Submit scaled map(s) showing the location of proposed abandoned line; USGS quadrangle(s) should be used as base map(s). Show the following (as applicable):
 - a. Existing access route(s);
 - b. Proposed access route(s); and
 - c. Location of pipeline.

C. Plats:

1. Submit scaled plat(s) showing the layout, dimensions, and design of the proposed operations. Scale should be large. Include cross-sections where appropriate. Show the following (as applicable):
 - a. Access route dimensions;
 - b. Surface disturbance dimensions;
 - c. Location and size of all excavations (ditches, sumps, etc.);
 - d. Location and size of all equipment including tanks, pipelines, metering points, heater treaters, separators, etc. that will be removed or abandoned;
 - e. Location of any sanitary facilities;
 - f. Location of pipeline control valves, pressure regulators, pressure and volume monitors and alarms, and cathodic protection (rectifiers) stations that will be removed or abandoned; and
 - g. Other facilities and/or equipment to be abandoned or removed.

D. Topographic Maps:

1. Submit the following maps as determined by a Registered Professional Land Surveyor or Civil Engineer:
 - a. Route of pipeline to be abandoned;
 - b. Elevation of bay bottom or emergent soil above the pipeline at 200-ft intervals; and
 - c. Depth of cover over the pipeline at 200-ft intervals.

III. TIMETABLE FOR OPERATIONS

A. Provide the following dates or times (as applicable):

1. Estimated date to begin abandonment work;
2. Estimated time to clean line;
3. Estimated time to remove surface equipment;
4. Estimated time to complete abandonment work;
5. Estimated date when reclamation will begin; and
6. Estimated time to complete reclamation.

IV. DESCRIPTION OF ABANDONMENT WORK

Address the following items as applicable; be as detailed as possible.

- A. Methods, sequence of work, and all equipment used in abandonment work.
- B. Water requirements, amount and source.
- C. Testing programs and procedures for leak detection and spill avoidance.

- D. Describe in detail procedures for cleaning and sealing line.
- E. "Pig" launching/retrieving station(s).
- F. Amount and type(s) of liquid waste to be produced.
- G. Means of handling, storage, transportation and disposal of liquid waste.
- H. Describe wastes, other than liquid wastes, to be produced and means of handling, storage, transportation, and disposal.
- I. Describe all lines and ancillary equipment that will be either abandoned or removed; describe destination of material to be removed.
- J. Describe all actions to be taken to comply with regulatory operating standards (as applicable):
 - 1. Surface activities shall not be conducted within 500 ft of a watercourse, high pool shoreline, mean high tideline, or any structure or facility (excluding roads) used for unit interpretation or administration, unless specifically authorized;
 - 2. Protection of all survey monuments, witness corners, reference monuments and bearing trees;
 - 3. Posting of a sign showing operator name and operation identification number;
 - 4. Fencing around all wells, storage tanks, and high pressure equipment as specified by the Superintendent;
 - 5. Posting of warning signs acceptable to the Superintendent if operations are located in or near visitor use areas;
 - 6. Preventing accumulation of oil and other materials deemed to be fire hazards;
 - 7. Removal or storage of all materials not in use; and
 - 8. Operator accountability for all contractors' and subcontractors' compliance with the requirements of an approved plan of operations.
- K. Security measures to ensure public health and safety.

V. CONTAMINATING OR TOXIC SUBSTANCE SPILL CONTROL PLAN

This section shall include all actions to be performed in the event of a spill or release of any toxic or hazardous substance.

- A. List of fuels, chemicals, substances, and additives to be used during conduct of abandonment work.

- B. Identify toxic or hazardous substances that will be used or may be encountered during the operations, and potential hazards to humans and the environment.
- C. Describe anticipated abnormal pressures or temperatures expected to be encountered.
- D. Describe in detail the contingency actions to be performed in the event of toxic or hazardous substance release:
 - 1. Notification of appropriate agencies (e.g., park, other federal, state and local);
 - 2. Actions to secure area to protect public;
 - 3. Spill containment actions including necessary equipment; and
 - 4. Cleanup/removal methods and equipment.
- E. Describe emergency response equipment to be maintained at the operation location and off-site equipment that can be mobilized including name(s) and telephone number(s) of contact persons and response time.
- F. Describe how waste and other chemicals will be stored, impounded, and disposed.

VI. RECLAMATION PLAN

This section shall describe all actions related to proper reclamation of surface estate that may be disturbed by the proposed operation.

- A. Removal of all surface structures, equipment, and man-made debris:
 - 1. Remove all above-ground structures including storage buildings, water tanks, fuel storage tanks, production equipment, powerlines, etc., except as required for continued production operations. All structures must be removed upon abandonment of the operation except with the approval of the Superintendent;
 - 2. Remove all equipment including tools, production equipment, valves, flanges, all vehicle parts, etc.;
 - 3. Remove trash and debris including fuel, chemicals, and blasting materials. Such materials must be disposed of at an approved site; and
 - 4. Provide explanation for any structures, etc. that are to be left in place.
- B. Surface restoration:
 - 1. Remove all lumber, gravel, shell, metal, or other material;
 - 2. Remove all dams, dikes, berms, etc., fill with existing topsoil and regrade to previous contour; and
 - 3. Remove temporary access roads by pulling out culverts and temporary bridges, and by recontouring road profile to match the natural topographic grade.

- C. Replacing topsoil, recontouring, and revegetating (if applicable):
 - 1. Spread stockpiled topsoil and grade to original contours;
 - 2. Provide topographic cross-sections showing the site configuration after reclamation;
 - 3. Reseed and/or transplant native grasses and other native vegetation as prescribed by the NPS:
 - a. Describe seedbed preparation, e.g., ripping, dicing, scarifying, etc.;
 - b. Identify native plant species, including seed or transplant sources, collection methods (if not available commercially), seed mixtures, percent live seed, seeding rates, seeding methods (e.g., broadcast, seed drill, hydroseed, etc.) and mulching methods;
 - c. Watering methods, amounts, and frequency (if necessary);
 - d. Target species composition and structure, and percent cover.
 - 4. Methodology to monitor the area to determine success of revegetation efforts (e.g., species survival, vegetation density, diversity, percent cover, etc.) and to identify problem areas which may require additional actions.
 - 5. Describe specific actions to prevent influx of exotic plant species into disturbed area.
- D. Present an itemized list of estimated costs to accomplish reclamation actions. Cost estimates should address the following at a minimum:
 - 1. All equipment to be used in reclamation actions;
 - 2. Personnel;
 - 3. All materials such as fill, soil, seed, plants, mulch, erosion control fabric (if necessary);
 - 4. Water and trucking fees (if necessary);
 - 5. Vegetation monitoring costs; and
 - 6. Exotic species control costs.
- E. Discuss alternative reclamation methods and techniques and provide cost comparisons on each.

VII. AFFIDAVITS, STATEMENTS, AND PERMITS

- A. Provide a statement that the operator will fully comply with the plan of operations if approved by the NPS, and will further comply with all standards, stipulations, demands, and orders issued by the Regional Director.

- B. Submit an affidavit stating that the proposed operation is in compliance with all applicable federal, state, and local laws and regulations. Examples of applicable laws include, but are not limited to:
 - 1. 36 CFR 9B regulations;
 - 2. Applicable regulations under 36 CFR Parts 1-7;
 - 3. Clean Water Act (sections 402 and 404);
 - 4. Clean Air Act;
 - 5. State water law and/or regulations;
 - 6. Coastal Zone Management Act (requires a consistency statement);
 - 7. State oil and gas regulations; and
 - 8. Federal Energy Regulatory Commission regulations.
- C. Provide a copy of, or proof of application for, all permits required by other federal, state or local agencies.
- D. Provide a statement that the Superintendent will be assured access to the site as necessary to properly monitor the operation and to ensure compliance with the plan of operation.

VIII. DESCRIPTION OF NATURAL RESOURCES

- A. In conjunction with the survey requirements described in II.D., above, perform an environmental survey along the pipeline route. Methods are to be coordinated with the PINS, Corps of Engineers, and General Land Office (if applicable). The survey will include mapping of the following:
 - 1. Seagrass beds (25 ft to either side of pipeline);
 - 2. Oyster reefs (25 ft to either side of pipeline);
 - 3. Salt marshes (25 ft to either side of pipeline);
 - 4. Bird rookeries (within 1000 ft of pipeline); and
 - 5. Significant endangered species habitat.
- B. Describe soil types along the pipeline route.
- C. Describe vegetation composition along the pipeline route.

IX. DESCRIPTION OF CULTURAL RESOURCES

This information will be taken from the pipeline plan of operations.

X. SOCIAL AND ECONOMIC ENVIRONMENT

This information will be taken from the pipeline plan of operations.

XI. ENVIRONMENTAL CONSEQUENCES

- A. Describe the anticipated direct, indirect, and cumulative effects of the proposed operation on the unit's upland features and uses, wildlife, vegetation, soils, water resource, air quality, noise, and social and economic environments.
- B. Provide a description of the measures that will be taken to ensure minimum disturbance to natural resources (surface and subsurface) and historical, cultural, and archaeological resources.
- C. Describe the environmental impacts which cannot be mitigated.

XII. ALTERNATIVES

- A. Provide a detailed description of all reasonable technologically feasible alternative methods of operations (e.g., equipment, locations, season, etc.) and associated environmental effects.

XIII. DISCUSSION

Discuss the proposed plan of operations as related to the unit's Statement for Management and other planning documents furnished by the Superintendent.