



FORM C-LTR SUBMITTAL GUIDELINES

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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, and Amendments.

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		
<input type="text"/>	<input type="text"/>	
Operator Name	Operator Agent Name	
<input type="text"/>	<input type="text"/>	<input type="text"/>
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, or Amendment. This section is required.

APPLICATION TYPE			
<input type="checkbox"/> Renewal	<input type="checkbox"/> New Permit	<input type="checkbox"/> Inactivate	<input type="checkbox"/> Amendment

For full transfers and divesting partial transfers, you will select Amendment for your **APPLICATION TYPE**. For acquiring partial transfers, you will select New Permit for the **APPLICATION TYPE**.

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.

Was eminent domain ever declared for this permit?

Yes

No

Total Active Renewal Permit Mileage

Fill out this section to the best of your ability. Specify whether eminent domain was previously declared for this permit. The Total Active Renewal Mileage 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.

Was eminent domain ever declared for this permit?

Yes

No

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. Specify whether eminent domain was previously declared for this permit. 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 abandon in place all lines in a permit according to TAC §8 and 49 CFR §192-195. All abandoned lines must have no intention for future use. (Idle lines cannot be abandoned.)

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

Abandoned in Place

Merged into Permit

#####

Other (specify)

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 space provided to briefly specify the reason for this Inactivate permit application. If you need more space, you may use the **ADDITIONAL INFORMATION** section at the end of the form.

AMENDMENT

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

AMENDMENT

Only fill out this section of the form if the application being filed is for an Amendment. Amendment 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, 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](#).

<input type="checkbox"/> PA: Pipeline Addition (newly built pipeline)	<input type="text"/>	<input type="checkbox"/> BP: Abandoned in Place (must be completely abandoned)	<input type="text"/>
	Mileage Change		Mileage Change
<input type="checkbox"/> FC: Fluid Change (product change)	<input type="text"/>	<input type="checkbox"/> TM: Transfer Merge (acquire full transfer and merge into existing permit)	<input type="text"/>
	Mileage Change		Mileage Change
<input type="checkbox"/> MP: Merge Permits (consolidate permits within the same P-5)	<input type="text"/>	<input type="checkbox"/> PT: Partial Transfer (transfer part of a pipeline system to/from a different P-5)	<input type="text"/>
	Mileage Change		Mileage Change

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

<input type="checkbox"/> PM: Partial Merge (transfer part of a pipeline system within the same P-5)	<input type="text"/>	<input type="checkbox"/> OM: Other Modification (specify below)	<input type="text"/>
	Mileage Change		Mileage Change
<input type="checkbox"/> DP: Delete Pipeline (remove a pipeline from an existing permit)	<input type="text"/>	<input type="checkbox"/> FT: Full Transfer (transfer a full permit to/from a different P-5; <i>no shapefile required</i>)	<input type="text"/>
	Mileage Change		Mileage Change

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 newly built 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 MP:	List all merged permits...	
If PM:	<input type="checkbox"/> Acquiring <input type="checkbox"/> Divesting	List all merged permits...
If PT:	<input type="checkbox"/> Acquiring <input type="checkbox"/> Divesting	List all acquired or divested permits...
If FT:	<input type="checkbox"/> Acquiring <input type="checkbox"/> Divesting	List all acquired or divested permits...
If DP:	Select one of the following or type in a reason...	
If OM:	Specify OM: Other Modification...	

The If MP, If PM, If PT, If FT, If DP, and If OM questions should only be filled out if their corresponding T4_AMD code is being reported.

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 select a reason from the available options or type a reason into the field. You may input more than one DP: Delete Pipeline reason if more than one applies.

NOTE: For most DP: Delete Pipeline amendments, you will select a reason from the available options.

If the amendment is for OM: Other Modification, you must specify what this Other Modification is.

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 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.

