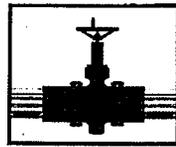


July 20, 2015



**PLAINS**  
**PIPELINE, L.P.**

RECEIVED  
JUL 24 2015  
State of California  
Central Coast Water Board

Kenneth Harris  
Executive Officer  
Central Coast Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

Re: *Tentative Resolution No. R3-2015-0026*

Dear Mr. Harris:

Plains Pipeline, L.P. ("Plains") appreciates the opportunity to submit comments regarding the Central Coast Regional Water Quality Control Board's ("Regional Water Board") Tentative Resolution No. R3-2015-0026 that refers any potential civil enforcement for the Refugio Oil Spill to the California Attorney General's office.

As you may know, Plains has worked tirelessly since the unfortunate accident involving Line 901, in conjunction with public agencies of the Unified Command, to ensure appropriate mobilization and response efforts. We understand that the Regional Water Board has been actively participating with other agencies in the Unified Command. The cleanup is substantially complete. Plains is committed to continuing the effort until the matter has been resolved. Plains appreciates Regional Water Board staff's explicit acknowledgement in the staff report accompanying the Tentative Resolution that the cleanup is proceeding well.

Plains continues to fully cooperate with government investigators while concurrently performing its own investigation to determine the cause of the incident, so as to help prevent similar incidents in the future, if possible. We regret any impacts of this accident, and believe that the results of the investigation will lead the Regional Water Board, along with the Attorney General's Office, to conclude that civil penalties are unwarranted in this matter. As such, premature findings made in the staff report accompanying the Tentative Resolution regarding the need for enforcement should not yet be endorsed by the Regional Water Board.

Plains also requests the Regional Water Board revise the Tentative Resolution and accompanying staff report to correct the identity of the "Dischargers." Item (1) of the Tentative Resolution should read:

Plains Pipeline, LP owns and operates Line 901 ("Pipeline") in the Central Coast Region, Santa Barbara County. Plains GP LLC is a general partner of Plains Pipeline, LP, and Plains All American GP LLC employs management and operational employees of Plains Pipeline, LP. Collectively these entities are referred to herein as the "Dischargers."

Should you have any questions, please do not hesitate to contact me.

Plains Marketing GP Inc., General Partner  
333 Clay Street, Suite 1600 (77002) ☒ P.O. Box 4648 ☒ Houston, Texas 77210-4648 ☒ 713/646-4100

Sincerely,

Plains Pipeline, L.P.  
By Plains GP LLC  
Its General Partner

A handwritten signature in black ink, appearing to read "Lawrence J. Dreyfuss". The signature is fluid and cursive, with a prominent initial "L" and "D".

Lawrence J. Dreyfuss  
Senior Vice President and  
General Counsel – Commercial & Litigation