



United States Department of the Interior  
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT

Gulf of Mexico OCS Region  
1201 Elmwood Park Boulevard  
New Orleans, Louisiana 70123-2394

In Reply Refer To: GE 1035A

July 20, 2018

Mr. William S. Goloway  
Manta Ray Gathering Company, L.L.C.  
919 Milam Street, Suite 2100  
Houston, Texas 77002

Dear Mr. Goloway:

Reference is made to your request dated May 30, 2018, to modify the existing surface safety system on Right-of-way (ROW) Platforms A & B in Ship Shoal 332 with supplemental data submitted on June 13, 2018, July 11, 2018, and July 13, 2018. The complex ID numbers for these platforms are 23212-1 and 23212-2.

Pursuant to 30 CFR 250.1000(b), your application to modify the existing surface safety system on Platforms A & B is hereby approved.

You shall submit written notification to this office within 30 days of the completion of the modification.

Sincerely,  
**PHILLIP**  
**SMITH**  
(for) Bryan A. Domangue  
Acting Regional Supervisor  
Regional Field Operations

Digitally signed  
by PHILLIP SMITH  
Date: 2018.07.20  
14:16:11 -05'00'



Manta Ray Gathering Company, L.L.C.

May 30, 2018

Mr. Bryan Domangue, Acting Regional Supervisor  
United States Department of the Interior  
Bureau of Safety and Environmental Enforcement  
1201 Elmwood Park Blvd.  
New Orleans, LA 70123-2394

*Via FedEx Tracking #: 772352005289*

Attn: Ms. Angie Gobert, Chief, Pipeline Section

**RE: APPLICATION FOR MODIFICATION OF EXISTING SURFACE SAFETY SYSTEM ON RIGHT-OF-WAY PLATFORM 'B', SHIP SHOAL 332, COMPLEX ID 23212-2, APPURTENANCE TO PIPELINE SEGMENT 14077, ROW OCS-G 24664; OCS FEDERAL WATERS GULF OF MEXICO, OFFSHORE, LOUISIANA**

Dear Ms. Gobert:

In accordance with provisions contained in Title 30 CFR 250.900 and 250.905, Manta Ray Gathering Company, L.L.C. ("MRGC"), as Operator, and on behalf of Poseidon Oil Pipeline Company, L.L.C. ("POPC"), respectfully submits this Application for Modification of Existing Surface Safety Facilities to the ROW Platform SS-332 'B', appurtenance to the PSN 14077, OCS-G 24464.

As part of the CHOPS System and Caesar to Poseidon Expansion project, Manta Ray Gathering Company, L.L.C. ("MRGC") is providing an alternate flow option for incoming oil from the 28-inch Caesar Pipeline (PSN #13677) to the Poseidon Pipeline (PSN #12470) on SS-332 'A', by utilizing the existing Allegheny 14-inch bridge pipe located on ROW Platform 'A' Ship Shoal 332, appurtenance to PSN 14077, ROW OCS-G 24664. Currently the bridge pipe flows from SS-332 'A' to SS-332 'B'. The 14-inch bridge pipe will be modified to allow the CHOPS Pipeline to flow from SS-332 'B' to SS-332 'A' if the CHOPS System is down or out of service.

To accommodate the bi-directional flow, MRGC will be removing two (2) existing check valve flappers on SS-332 'B' Platform (ROW OCS-G 24664) to allow oil to flow into the 14-inch bridge pipe. A more detailed description of the system overview and proposed modifications can be found in Exhibit 'A', Facility Addition and Modification Description.

On SS-332 'A' ROW Platform, appurtenance to PSN 8033, Manta Ray Offshore Gathering Company, L.L.C. ("MROGC") will relocate an existing ball valve and check valve and install a spool piece to connect the 14-inch bridge pipe to PSN #12470. A similar Application for Modification of Existing Surface Safety System is being simultaneously submitted by MROGC regarding the modifications needed on SS-332 'A' Platform.

As support for the modification application, enclosed are the following data and modified drawings:

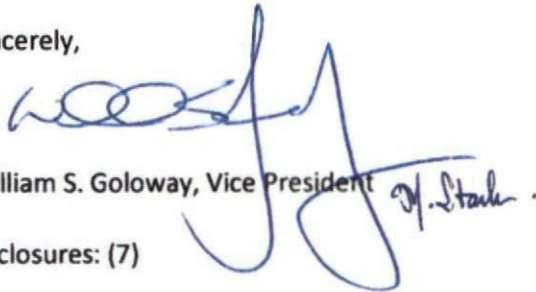
- Certification Statement (2)
  - Bill S. Goloway, Officer for Manta Ray Gathering Company, L.L.C.
  - Ronald J. Marcomb, Jr., PE

- Facility Addition and Modification Description
- Safety Flow Diagrams
- Piping and Instrument Diagram
- Safe Analysis Function Evaluation (SAFE) Charts

Also enclosed, please find the pay.gov Receipt ID# 26A045MN as payment for the \$4,169.00 application fee.

If you have any questions or comments, please contact Jessica Stone at [Jessica.stone@genlp.com](mailto:Jessica.stone@genlp.com) or 832-280-3093.

Sincerely,

A handwritten signature in blue ink, appearing to read 'W. Goloway', is written over the typed name and title. To the right of the signature, there is a smaller handwritten signature that appears to read 'M. Stark'.

William S. Goloway, Vice President

Enclosures: (7)

Xc: Jason McDonald  
Mike Stark  
Jessica Stone



## Receipt

### Your payment is complete

Pay.gov Tracking ID: 26A045MN  
Agency Tracking ID: 75497627019  
Form Name: Pipeline ROW Modification Application  
Application Name: BSEE Pipeline ROW Modification Application - BY

### Payment Information

Payment Type: Debit or credit card  
Payment Amount: \$4,169.00  
Transaction Date: 05/30/2018 01:56:35 PM EDT  
Payment Date: 05/30/2018  
Region : Gulf of Mexico  
Contact: Jessica Stone 832-280-3093  
Company Name/No: Manta Ray Gathering Company, L.L.C., 01796  
Pipeline Segment No.: 14077

### Account Information

Cardholder Name: Jessica Stone  
Card Type: Visa  
Card Number: \*\*\*\*\*5666

### Email Confirmation Receipt

Confirmation Receipts have been emailed to:  
jessica.stone@genlp.com

# STATEMENT OF CERTIFICATION

MANTA RAY GATHERING COMPANY, L.L.C.  
SHIP SHOAL-332 'B' PLATFORM  
ROW OCS-G 24664

## CERTIFICATION

The design of the mechanical, electrical, and instrument system modifications has been supervised and approved by registered mechanical and electrical professional engineers. These modifications are described in the following section and in the attached drawings.

Manta Ray Gathering Company, L.L.C.  
919 Milam Street, Suite 2100  
Houston, Texas 77002

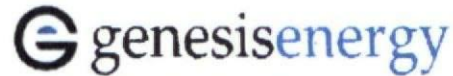
Name: William S. Goloway

Signed: 

Title: Vice President

Date: 09-30-2018

*M. Steele*



**Manta Ray Gathering Company, L.L.C.**  
**Ship Shoal Block 332 "B" Facility**  
**Caesar to Poseidon Flow Option**  
**Star Job No.: 373-2214**  
**May 14<sup>th</sup>, 2018**

**EXHIBIT A**  
**FACILITY ADDITION and MODIFICATION DESCRIPTION**

Pursuant to DOI (BSEE) 30 CFR Part 250 Subpart H, Manta Ray Gathering Company, L.L.C. (MRGC) on behalf of Poseidon Oil Pipeline Company, L.L.C., herewith submits this application to the District Supervisor for approval to add an additional Caesar to Poseidon Flow Option. This flow option would allow additional Caesar Oil Production throughput to the Poseidon Pipeline System only in the event that the CHOPS Pipeline System is "Shut-Down" and/or "Out of Service". This Modification affects both Enbridge's Production Facility, Lease OCS-G No. 10069, Ship Shoal Block 332 "A" Platform, and Genesis' Lease OCS-G No. 24664, Ship Shoal Block 332 "B" Platform, Federal Waters, Gulf of Mexico, Offshore, Louisiana.

In summary, the 28" Caesar Oil Incoming Pipeline arrives at Ship Shoal Block 332 "B" Platform where it has the Flow Option to be metered to both the CHOPS and Poseidon Pipeline System(s), respectively. The Caesar-CHOPS flow option is metered at the "B" platform and then pumped locally from the "B" Platform to the CHOPS Pipeline. The Caesar-Poseidon flow option is metered at the "B" platform but then the oil flows to the Ship Shoal Block 332 "A" Platform via a 12" dedicated Caesar bridge pipe where it is then pumped from the "A" Platform to the Poseidon Pipeline.

In the event that the CHOPS pipeline system is inoperable due to unforeseen and /or planned circumstances, Genesis is adding another flow path that allows additional Caesar Oil through the CHOPS Meter system to flow to the Poseidon Pipeline Pump system. This flow path is achieved by utilizing the dedicated 14" Allegheny to CHOPS bridge pipe, which flows from "A" to "B" Platform, by reversing its normal flow path designation from "B" to "A" Platform. At "A" Platform, a new pipe segment will be routed to an existing tie-in, located on the Poseidon Header that would allow the reverse flow from the Allegheny line to provide the additional Caesar Oil throughput to Poseidon.

In addition, the existing Jackalope Incoming Line from Ship Shoal Block 332 "A" Platform to Cameron Highway Oil Pipeline (CHOPS) pipeline has been identified on both the Safety Flow Diagram and SAFE Charts.

All Safety Flow Diagrams, Piping and Instrument Diagrams, and SAFE Charts are included in this package. The tables below depict the drawings affected in this revision.

**Safety Flow Diagrams:**

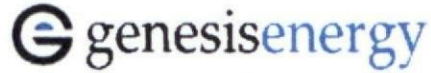
REV.	DRAWING NO.	DRAWING DESCRIPTION
12	22-OS-SS332B-11-0207	SAFETY FLOW DIAGRAM – JACKALOPE METERING
12	22-OS-SS332B-11-0210	SAFETY FLOW DIAGRAM – OIL SHIPPING PUMPS & PIG LAUNCHER

**Process and Instrumentation Diagrams (P&IDs):**

REV.	DRAWING NO.	DRAWING DESCRIPTION
16	22-OS-SS332B-11-1005	PIPING AND INSTRUMENT DIAGRAM

**SAFE Charts:**

REV.	DRAWING NO.	DRAWING DESCRIPTION
21	1 thru 8	SAFE CHARTS



**Genesis Energy, LP**  
**Ship Shoal Block 332 "B" Facility**  
**Caesar to Poseidon Flow Option**  
**Star Job No.: 373-2214**  
**May 14<sup>th</sup>, 2018**

**EXHIBIT B**  
**STATEMENT OF CERTIFICATION**

Production facilities shall be protected with surface safety systems designed, analyzed, tested and maintained in operative condition in accordance with the provisions of API RP 14C and DOI (BSEE) Title 30 CFR 250 Subpart H at the Production Facilities, Lease OCS-G No. 24664, Ship Shoal Block 332, Platform "B"; OCS Federal Waters, Gulf of Mexico, Offshore, Louisiana. Registered Mechanical and Electrical Professional Engineers have approved the revisions to the Mechanical and Electrical Safety Systems. The attached drawings and application fully describe these systems as revised.

Note: This Facility Permit Application Statement of Certification is standard as per location. The Additions and/or Modifications described for these systems for this permit did not revise any Electrical Safety Systems. Only the Registered Mechanical Professional Engineer has stamped, signed and dated this Statement of Certification.





Manta Ray Gathering Company, L.L.C.

June 12, 2018

Mr. Bryan Domangue, Acting Regional Supervisor  
United States Department of the Interior  
Bureau of Safety and Environmental Enforcement  
1201 Elmwood Park Blvd.  
New Orleans, LA 70123-2394

*Via email: Phillip.Smith@bsee.gov*

Attn: Ms. Angie Gobert, Chief, Pipeline Section

**RE: Amendment 1 - APPLICATION FOR MODIFICATION OF EXISTING SURFACE SAFETY SYSTEM ON RIGHT-OF-WAY PLATFORM 'B', SHIP SHOAL 332, COMPLEX ID 23212-2, ROW OCS-G 24664 and RIGHT-OF-WAY PLATFORM 'A', SHIP SHOAL 332, COMPLEX ID 23212-1, ROW OCS-G 10069; OCS FEDERAL WATERS GULF OF MEXICO, OFFSHORE, LOUISIANA**

Dear Ms. Gobert:

By letter dated May 30, 2018, Manta Ray Gathering Company, L.L.C. (MRGC) submitted an application for Modification of Existing Surface Safety System on ROW Platform 'B', Ship Shoal 332. MRGC would like to amend said letter by including the modifications proposed on ROW Platform 'A', Ship Shoal 332, due to the modifications being part of the same project.

Therefore, in accordance with provisions contained in Title 30 CFR 250.900 and 250.905, MRGC, as Platform Operator, respectfully submits this Amendment 1 - Application for Modification of Existing Surface Safety Facilities to the ROW Platform SS-332 'B', appurtenance to the PSN 14077, OCS-G 24464 and ROW Platform SS-332 'A', appurtenance to the PSN 8033, OCS-G 10069.

As previously described in the letter dated May 30, 2018, part of the CHOPS System and Caesar to Poseidon Expansion project, MRGC is providing an alternate flow option for incoming oil from the 28-inch Caesar Pipeline (PSN #13677) to the Poseidon Pipeline (PSN #12470) on SS-332 'A', by utilizing the existing Allegheny 14-inch bridge pipe located on ROW Platform 'A' Ship Shoal 332, appurtenance to PSN 8033, ROW OCS-G 10069. Currently the bridge pipe flows from SS-332 'A' to SS-332 'B'. The 14-inch bridge pipe will be modified to allow the CHOPS Pipeline to flow from SS-332 'B' to SS-332 'A' if the CHOPS System is down or out of service.

To accommodate the reverse flow, on SS-332 'B' Platform (ROW OCS-G 24664) MRGC will be removing two (2) existing check valve flappers to allow oil to flow from the 'B' Platform into the 14-inch bridge pipe. Modified drawings and updated data for the SS-332 'B' platform were provided with the original application submittal.

On SS-332 'A' ROW Platform (ROW OCS-G 10069), MRGC will relocate an existing ball valve and check valve and install a spool piece to connect the 14-inch bridge pipe to PSN #12470. A more detailed description of the system overview and proposed modifications on SS-332 'A' platform can be found in Exhibit 'A', Facility Addition and Modification Description.

115.



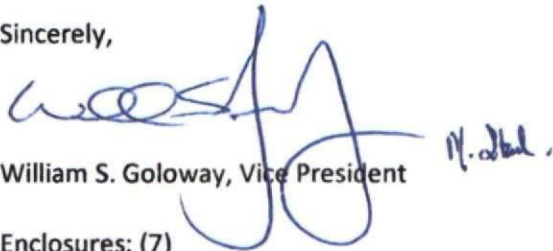
As support for the modification application, enclosed are the following data and modified drawings pertaining to the SS-332 'A' Platform:

- Certification Statement (2)
  - Bill S. Goloway, Officer for Manta Ray Gathering Company, L.L.C.
  - Ronald J. Marcomb, Jr., PE
- Facility Addition and Modification Description
- Safety Flow Diagrams
- Piping and Instrument Diagram
- Safe Analysis Function Evaluation (SAFE) Charts

The pay.gov Receipt ID# 26A045MN as payment for the \$4,169.00 application fee was previously provided.

If you have any questions or comments, please contact Jessica Stone at [Jessica.stone@genlp.com](mailto:Jessica.stone@genlp.com) or 832-280-3093.

Sincerely,



William S. Goloway, Vice President

Enclosures: (7)

Xc: Jason McDonald  
Mike Stark  
Jessica Stone

# STATEMENT OF CERTIFICATION

MANTA RAY GATHERING COMPANY, L.L.C.  
SHIP SHOAL-332 'A' PLATFORM  
ROW OCS-G 10069

## CERTIFICATION

The design of the mechanical, electrical, and instrument system modifications has been supervised and approved by registered mechanical and electrical professional engineers. These modifications are described in the following section and in the attached drawings.

Manta Ray Gathering Company, L.L.C.  
919 Milam Street, Suite 2100  
Houston, Texas 77002

Name: William S. Goloway

Signed: 

Title: Vice President

Date: \_\_\_\_\_

*M. Stahl.*



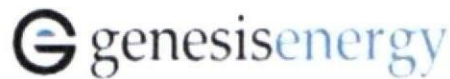
**Ship Shoal Block 332 "A" Facility**  
**Caesar to Poseidon Flow Option**  
**Star Job No.: 373-2214**  
**May 14<sup>th</sup>, 2018**

**EXHIBIT B**  
**STATEMENT of CERTIFICATION**

Production facilities shall be protected with surface safety systems designed, analyzed, tested and maintained in operative condition in accordance with the provisions of API RP 14C and DOI (BSEE) Title 30 CFR 250 Subpart H at the Production Facilities, Lease OCS-G No. 10069, Ship Shoal Block 332, Platform "A" Federal Waters, Gulf of Mexico, Offshore, Louisiana. Registered Mechanical and Electrical Professional Engineers have approved the revisions to the Mechanical and Electrical Safety Systems. The attached drawings and application fully describe these systems as revised.

Note: This Facility Permit Application Statement of Certification is standard as per location. The Additions and/or Modifications described for these systems for this permit did not revise any Electrical Safety Systems. Only the Registered Mechanical Professional Engineer has stamped, signed and dated this Statement of Certification.





**Manta Ray Gathering Company, L.L.C.**  
**Ship Shoal Block 332 "A" Facility**  
**Caesar to Poseidon Flow Option**  
**Star Job No.: 373-2214**  
**May 14<sup>th</sup>, 2018**

**EXHIBIT A**  
**FACILITY ADDITION and MODIFICATION DESCRIPTION**

Pursuant to DOI (BSEE) 30 CFR Part 250 Subpart H, Manta Ray Gathering Company, L.L.C., (MRGC) herewith submits this application to the District Supervisor for approval to add an additional Caesar to Poseidon Flow Option. This flow option would allow additional Caesar Oil Production throughput to the Poseidon Pipeline System only in the event that the CHOPS Pipeline System is "Shut-Down" and/or "Out of Service". This Modification affects both Enbridge's ROW Facility, Lease OCS-G No. 10069, Ship Shoal Block 332 "A" Platform, and MRGC's ROW OCS-G No. 24664, Ship Shoal Block 332 "B" Platform, Federal Waters, Gulf of Mexico, Offshore, Louisiana.

In summary, the 28" Caesar Oil Incoming Pipeline arrives at Ship Shoal Block 332 "B" Platform where it has the Flow Option to be metered to both the CHOPS and Poseidon Pipeline System(s), respectively. The Caesar-CHOPS flow option is metered at the "B" platform and then pumped locally from the "B" Platform to the CHOPS Pipeline. The Caesar-Poseidon flow option is metered at the "B" platform but then the oil flows to the Ship Shoal Block 332 "A" Platform via a 12" dedicated Caesar bridge pipe where it is then pumped from the "A" Platform to the Poseidon Pipeline.

In the event that the CHOPS pipeline system is inoperable due to unforeseen and /or planned circumstances, MRGC is adding another flow path that allows additional Caesar Oil through the CHOPS Meter system to flow to the Poseidon Pipeline Pump system. This flow path is achieved by utilizing the dedicated 14" Allegheny to CHOPS bridge pipe, which flows from "A" to "B" Platform, by reversing its normal flow path designation from "B" to "A" Platform. At "A" Platform, a new pipe segment will be routed to an existing tie-in, located on the Poseidon Header that would allow the reverse flow from the Allegheny line to provide the additional Caesar Oil throughput to Poseidon.

In addition, the existing Jackalope to Cameron Highway Oil Pipeline (CHOPS) pipeline to Ship Shoal Block 332 "B" Platform has been identified on both the Safety Flow Diagram and SAFE Charts.

All Safety Flow Diagrams, Piping and Instrument Diagrams, and SAFE Charts are included in this package. The tables below depict the drawings affected in this revision.

**Safety Flow Diagrams:**

REV.	DRAWING NO.	DRAWING DESCRIPTION
29	SS332A-SF-002	SAFETY ANALYSIS FLOW DIAGRAM

**Process and Instrumentation Diagrams (P&IDs):**

REV.	DRAWING NO.	DRAWING DESCRIPTION
27	SS332A-PD-0207	PIPING AND INSTRUMENT DIAGRAMS

**SAFE Charts:**

REV.	SAFE CHART NO.	DESCRIPTION
42	1 thru 17	SAFE CHARTS