

CG-8-048-02R

SHELL OIL COMPANY
One Shell Plaza
P. O. Box 4320
Houston, TX 77210

PLAINTIFF'S EXHIBIT

SH-1436

October 22, 1986

Mr. C. E. Bishop
Manager, Employee Relations
Shell Pipe Line Corporation
P. O. Box 2648
Houston, TX 77001

Dear Mr. Bishop:

SUBJECT: Health and Safety Compliance Assurance Review

This is pursuant to the service agreement between Shell Oil Company and Shell Pipe Line Corporation. A Health and Safety Compliance Assurance Review was conducted August 4-7, 1986, in accord with your July 26, 1983, standing letter requesting periodic reviews. This review encompassed the Central Operations Division and included the Division Office (Midland, TX) and six field sites: Odessa (warehouse, welding shop, products station), McCamey (control center, maintenance), Mesa Station (Rancho pipeline), Goldsmith (operations, maintenance), Kermit (operations and maintenance), and Denver City (Wasson station, Allred CO₂ station). The Shell Oil Company review personnel were Dr. David Miller, M.D., (Corporate Medical) and Mr. John Harris (Safety and Industrial Hygiene). Shell Pipe Line Corporation personnel accompanying the review team were Mr. C. H. Long and the local field representatives. The compliance review was conducted by reviewing administrative records and programs and by interviewing Division personnel representing safety and line supervision and a small number of hourly personnel.

We conclude that the Central Operations Division has systems in place to ensure compliance with laws, regulations and Shell policies pertaining to health and safety. Additional comment is provided in the separate report from the Corporate Medical Department.

The review tested for compliance with the requirements of the Occupational Safety and Health Administration (OSHA), the Department of Transportation (DOT), and selected corporate health and safety policies. We also confirmed that the DOT regulatory compliance program administered by the SPLC Regulations and Maintenance Standards group is in place and functioning effectively to ensure compliance. Additionally, we determined that the Division is implementing a program to ensure compliance with Texas state right-to-know regulations. This will supplement state regulation programs already implemented.

LAM 023989

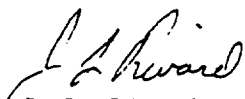
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ABS-007171

Elements of the health and safety systems noted were: (1) a knowledgeable safety staff with a recognized presence in the field; (2) applicable SPLC procedural manuals including the Safety Procedures Manual, Emergency and Contingency Procedures manuals, and the SPLC DOT Regulatory manuals (federal and state); (3) Awareness of the need for required OSHA posters and accident/injury logs; (4) emergency medical provisions; (5) partial records documenting fire extinguisher and most other safety equipment inspections; and (6) allied support activities such as documented employee training and safety meetings and available Material Safety Data Sheets (MSDS). Additional topics considered in the review are shown on the summary (Attachment 1), which lists existing strengths as well as opportunities for further strengthening the programs.

Thank you for the courtesy and cooperation shown by the SPLC staff at each of the visited sites. We would be happy to discuss any of the findings with you or your staff. Should you have any questions, please call Mr. J. D. Harris (241-0043).

Yours truly,



J. L. Rivard, manager
Regulations & Safety Services

LAM 023990

HEALTH AND SAFETY REVIEW SUMMARY WORKSHEET -- AUGUST 1986

ORGANIZATION SHELL PIPE LINE CORP.

REVIEWER

J. D. HARRIS

SEGMENT

CENTRAL DIVISION

TOPICS & REFERENCES

STRENGTHS

CONCERNS

1094

LAM 023991

ABS-007173

TOPICS & REFERENCES	STRENGTHS	CONCERNS
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SUBSTANCE EXPOSURES

. Asbestos - 1910.1001 Insulation has been removed.

LAM 023992

ABS-007174