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PROJECT NO. 53385

PROJECT TO SUBMIT EMERGENCY	§	PUBLIC UTILITY COMMISSION
OPERATIONS PLANS AND RELATED	§	
DOCUMENTS UNDER 16 TAC § 25.53	§	OF TEXAS
	§	

SOUTH HOUSTON GREEN POWER, LLC's

EMERGENCY OPERATIONS PLAN

Pursuant to 16 Texas Administrative Code ("TAC") § 25.53, South Houston Green Power, LLC (SHGP) hereby files an executive summary of its Emergency Operations Plan (EOP), which describes the contents and policies contained in the EOP, includes references to specific sections of the EOP that correspond with the requirements of 16 TAC § 25.53, includes the EOP's record of distribution, and attaches the required affidavit and a redacted copy of the EOP. The following executive summary is incorporated into SHGP's EOP in full.

I. Executive Summary

SHGP is a wholly owned subsidiary of Marathon Petroleum Company LP (MPC). SHGP is registered with the Public Utility Commission of Texas as a Power Generation Company and is located within the MPC Galveston Bay Refinery (GBR) property. The SHGP cogeneration facility reports up to GBR.

The SHGP EOP is a combination of multiple documents, including this Executive Summary, that provides a comprehensive summary of the procedures, plans, and processes used to address various emergency situations impacting the site. This EOP is approved and issued as of April 14, 2022 and supersedes all previous versions.

Redacted annexes are included as Attachment A to the Executive Summary. Attachment B to the Executive Summary is the affidavit required by 16 TAC § 25.53(c)(4)(C).

The SHGP EOP annexes address the following key areas of reliability:

- A. Weather Emergency - Freeze Protection Preparation and Execution Procedures
- B. Weather Emergency - Severe Hot Weather
- C. Emergency Shortage of Water
- D. Restoration of Service

- E. Pandemic Preparedness
- F. Tropical Weather/Hurricane Plan
- G. Cyber Security
- H. Physical Security

II. Common Operational Functions

Standard practices and procedures promote a continuous state of reliability in all seasons and weather conditions. The Commercial Manager is responsible for implementation and updates to the EOP. The Area Team Leader has overall responsibility for adherence to the EOP. This EOP is issued as of April 14, 2022 and supersedes all previous versions.

Additionally, the site utilizes the National Incident Management System (NIMS). Qualified employees are assigned to the GBR Incident Management Team (IMT). The IMT will activate during designated emergency situations and will make notifications as necessary, including communications with external entities.

III. Annexes

A. Freeze Protection Preparation and Execution Procedures

Severe cold weather is periodically experienced in the Texas City, TX area and can adversely impact the site if not effectively addressed. Good Utility Practices along with site Standard Practices and Procedures are continually employed with a focus on personal and process safety, environmental compliance, and equipment reliability. An annual “lessons learned” review is conducted at the conclusion of the winter season, to include follow-up action items.

Site personnel comply with the following procedures to ensure reliable operations:

- HESS-EP-000098-GB (GBR Freeze Plan)
- ROP-0501-5044 GP2 Freeze Plan Preparation
- ROP-0501-5045 GP2 Freeze Protection Execution
- ROP-0502-5009 PWR4 Freeze Protection Preparation
- ROP-0502-5010 PWR4 Freeze Protection Execution
- ROP-0503-5001 WTP1 Freeze Protection Preparation
- ROP-0503-5002 WTP1 Freeze Protection Execution
- ROP-0505-5002 WTP4 Freeze Protection Preparation
- ROP-0505-5003 WTP4 Freeze Protection Execution

B. Severe Hot Weather Plan

SHGP is designed to operate in hot weather conditions. The site does not have a specific plan for “Severe” heat conditions. However, Good Utility Practices along with site Standard Practices and

Procedures are continually employed with focus on personal and process safety, environmental compliance, and equipment reliability.

Site personnel comply with the following processes and tasks to ensure reliable operations:

- Routine operator rounds to verify equipment is working correctly and process variables are within established limits
- Alarm monitoring within the control room
- Work Order Notifications are made for malfunctioning equipment, including a prioritization system for repairs
- Sound preventive maintenance programs
- IR inspection of equipment
- Hours based outages are taken for generating units

C. Emergency Shortage of Water

GBR and SHGP are supplied with raw water from the Gulf Coast Water Authority, who in turn receives raw water from the Brazos River Authority. Emergency procedures address steps to be taken internally and cannot account for the actions of the Gulf Coast Water Authority or the Brazos River Authority. The following plans and procedures are associated with Emergency Shortage of Water situations:

- EOP-0503-4000 Loss of River Water Emergency Operating Procedure
- EOP-0505-4000 Loss of River Water Emergency Operating Procedure

D. Restoration of Service

SHGP electric generating assets are natural gas only units with no fuel switching capability. Unplanned or forced outages can result from multiple causes. However, in the event of a loss of generation, SHGP personnel will respond appropriately to each situation to ensure personal and process safety, environmental compliance, reliability, protection of equipment, and restoration of the capacity. It should be noted that the time to re-start a unit will be determined by the root cause and is unique to each event. Any loss of capacity will be communicated to ERCOT via the Qualified Scheduling Entity. The following procedures apply to loss of generation including low natural gas pressure events:

- EOP-0501-4003-GB.docx (Loss of Gas Turbine – GP2)
- EOP-0501-4002-GB.docx (Loss of STG804 – steam turbine)
- EOP-0501-4004-GB.docx (7FA Runback to FSNL)
- EOP-0502-3001-GB.docx (Loss of Gas Turbine – Power 4)
- EOP-0502-4007-GB.docx (7EA Runback to FSNL)
- EOP-0501-4000-GB.docx (Low Natural Gas Header Pressure – GP2)

- EOP-0502-4002-GB.docx (Low 400 PSIG Natural Gas Pressure - Power 4)

It should be noted that SHGP utilizes Firm natural gas transportation contracts with established Operational and Commercial and commercial communication paths.

E. *Pandemic Preparedness*

SHGP is included under the “Galveston Bay Refinery Pandemic Illness Response Plan”. This plan covers the activation procedures, organizational roles and responsibilities, and recovery strategies under a pandemic threat scenario. Full details are found within the following plan:

- Galveston Bay Refinery Pandemic Illness Response Plan

F. *Tropical Weather/Hurricane Plan*

The safety of GBR employees, the community, and its neighbors is the prime consideration in determining the course of action during a threatening tropical storm or hurricane. The “Galveston Bay Refinery Tropical Weather Preparedness and Response Plan” is a detailed document containing the following sections:

1. Plan Introduction
2. Planning Action
3. Preparedness – Department Specific Plans
4. Ride-Out Crew Actions
5. Post Hurricane Damage Assessment Checklists
6. Appendices

Site personnel will respond in accordance with this plan and other management decisions during hurricane threat events.

G. *Cyber Security*

SHGP is governed by multiple MPC and GBR cyber security policies and procedures to protect the Operating Technology (OT) network:

- OT-001 Operational Technology (Identify)
- OT-002 Operational Technology (Protect)
- OT-003 Operational Technology (Detect)
- OT-004 Operational Technology (Respond)
- OT-005 operational Technology (Recover)
- PR-401 Security Event Response
- PR-132 Countermeasures Capabilities

H. Physical Security

SHGP physical security is governed by the GBR Facility Security Plan (FSP) on file with the Department of Homeland Security. The FSP is mandated by the Maritime Transportation Security Act (MTSA) and reviewed annually by the U.S. Coast Guard. The FSP is considered highly sensitive and protected. Access to the facility is controlled with perimeter fencing, manned gates, and access cards. The site is monitored 24 hours a day by security personnel.

IV. Record of Distribution

The SHGP EOP is distributed to the following personnel:

Name	Title	Department	Issue Date
[REDACTED]	Commercial Manager	Operations	04/14/2022
[REDACTED]	Area Team Leader	Operations	04/14/2022
[REDACTED]	Day Foreman	Operations	04/14/2022
[REDACTED]	Operations Excellence Specialist	Operations	04/14/2022

V. Emergency Contact Information

Emergency Contact:

Allen Rinard
O: (409) 941-8382
C: (832) 475-2505
adrinard@marathonpetroleum.com

VI. Revision Log

Revision Log:

Version	Revisions Made	Revised By	Date
Initial Issue			4/14/22

The Revision Log captures any significant changes to the overall effectiveness of the EOP. Changes include adding or replacing Annexes. Revisions to Annexes (referenced documents) will be made within those documents.

VII. Compliance Reference Chart

Consistent with 16 TAC § 25.53(c)(1)(A)(i)(II), below is a chart summarizing the rule requirements applicable to SHGP and corresponding EOP references.

Requirement	Rule Reference	EOP Reference
Contents and policies contained in the EOP	25.53(c)(1)(A)(i)(I)	Executive Summary
EOP cross reference to rule requirements	25.53(c)(1)(A)(i)(II)	This chart
Record of distribution	25.53(c)(1)(A)(i)(III) 25.53(c)(4)(A)	Executive Summary at 5
Affidavit	25.53(c)(1)(A)(i)(IV) 25.53(c)(4)(C)	Attachment B to Executive Summary
Redacted copy of EOP	25.53(c)(1)(A)(ii)	Executive Summary Attachment A to Executive Summary
Emergency Contact List	25.53(c)(4)(B)	Executive Summary at 5
Common operational functions across emergency types	25.53(d)	Executive Summary at 2
Introduction of EOP and outline of its applicability	25.53(d)(1)(A)	Executive Summary at 1-5 outlines the EOP, including the annexes, and its applicability
List of individuals responsible for maintaining and implementing the EOP, and those who can change the EOP	25.53(d)(1)(B)	Executive Summary at 2, 5 Attachment A at 2, 16, 34, 41, 51, 56, 73, 80, 87, 95, 100, 106, 112, 117, 123, 131, 136, 141, 154, 157, 191, 198-201, 309, 333, 368, 380, 390, 399, 407
Revision control summary that lists the dates of each change made to the EOP	25.53(d)(1)(C)	Executive Summary at 5 Attachment A at 11, 32, 40, 46, 55, 72, 79, 85, 92, 99, 104, 111, 116, 122, 130, 135, 140, 151, 332, 367, 379, 389, 398, 406, 420
Dated statement that the current EOP supersedes previous plans	25.53(d)(1)(D)	Executive Summary at 1
Date the Plan was most recently approved by SHGP	25.53(d)(1)(E)	Executive Summary at 1
Communication plan	25.53(d)(2)(B)	Executive Summary at 2, 4 Attachment A at 10-11, 165-66, 169-75, 190, 204-05, 215, 283, 414

Emergency supply plan	25.53(d)(3)	Attachment A at 12, 178, 245, 293-97
Emergency staffing plan	25.53(d)(4)	Attachment A at 4-10, 97, 102, 108-09, 114, 119-20, 125-28, 133, 138, 143-49, 158-61, 164-77, 189-90, 201-03, 411-13
Flooding plan	25.53(d)(5)	The Tropical Weather/Hurricane Plan (Attachment A at pages 184-307) covers flooding. See, e.g., Attachment A at 190, 206, and 303-04
Hurricane plan	25.53(d)(5) 25.53(e)(2)(E)	Attachment A at pages 184-307
Tornado plan	25.53(d)(5)	The Tropical Weather/Hurricane Plan (Attachment A at pages 184-307) covers tornadoes. See Attachment A at 303-05
Extreme heat plan	25.53(d)(5) 25.53(e)(2)(A) 25.53(e)(2)(A)(i) 25.53(e)(2)(A)(iii)	Attachment A at 93
Extreme cold plan	25.53(d)(5) 25.53(e)(2)(A) 25.53(e)(2)(A)(i) 25.53(e)(2)(A)(iii)	Attachment A at 1-92
Fuel switching equipment	25.53(e)(2)(A)(ii)	Not applicable. As stated in the Executive Summary, the SHGP facility does not have fuel switching capability.
Water shortage plan	25.53(d)(5) 25.53(e)(2)(B)	Attachment A at 94-104
Restoration of service plan	25.53(e)(2)(C)	Attachment A at 105-51
Pandemic and epidemic plan	25.53(e)(2)(D)	Attachment A at 152-83
Cyber security plan	25.53(e)(2)(F)	Attachment A at 308-420
Physical security incident plan	25.53(e)(2)(G)	Attachment A at 421

April 18, 2022

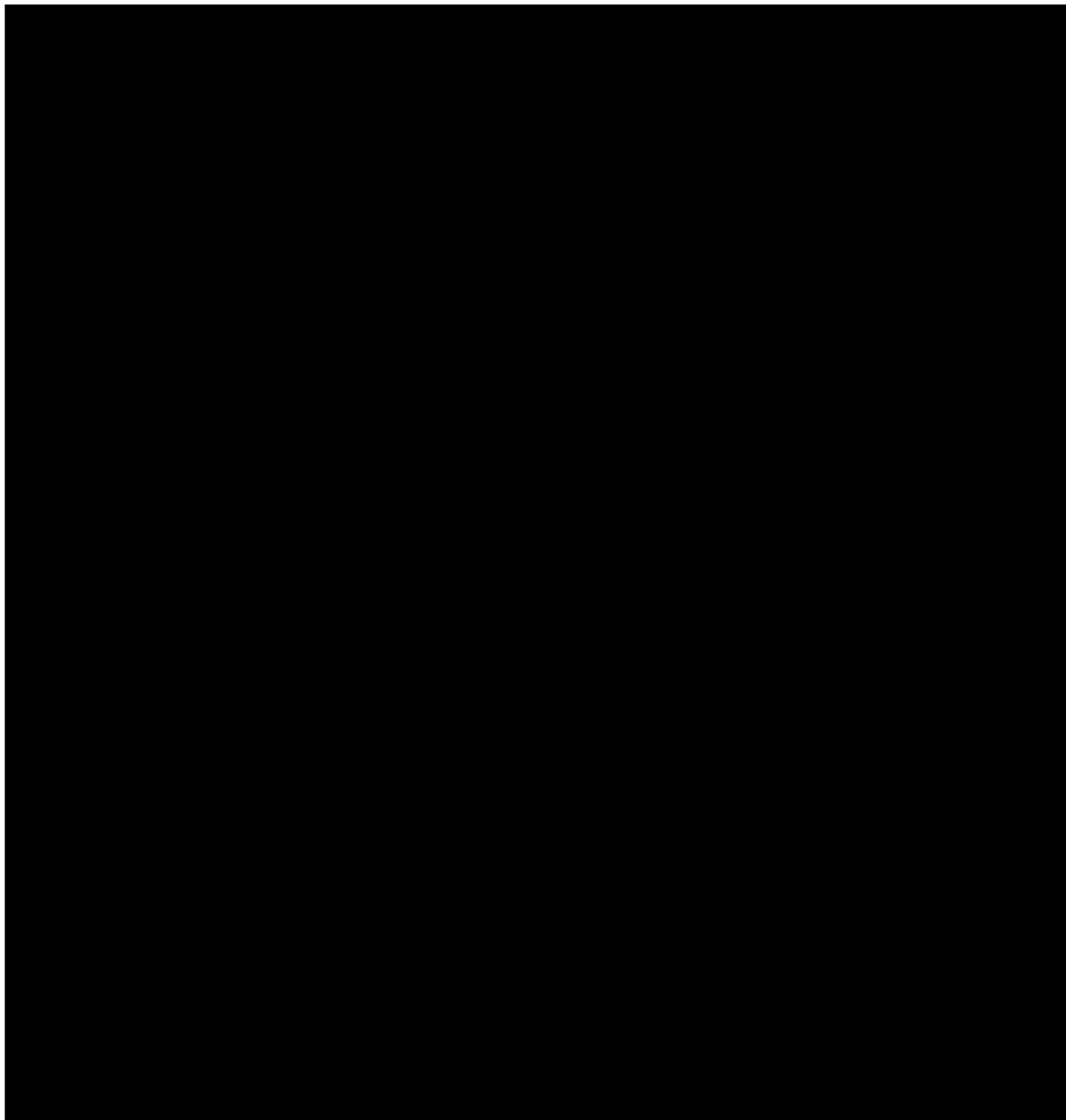
Respectfully Submitted,

/s/ Allen Rinard
Allen Rinard
South Houston Green Power, LLC

Annex A

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Authored By: Raudel Vela	<u>Marathon Petroleum Company LP</u> GBR FREEZE PLAN	Doc. No.: HESS-EP-000098-GB	
Doc Custodian: Operations		Rev. No.: 4	Page 1 of 14
Approved By: CP Patsatzis		Galveston Bay Refinery	
Date Approved: 11/16/2018		Next Review Date: 11/16/2023	Effective Date: 12/01/2018



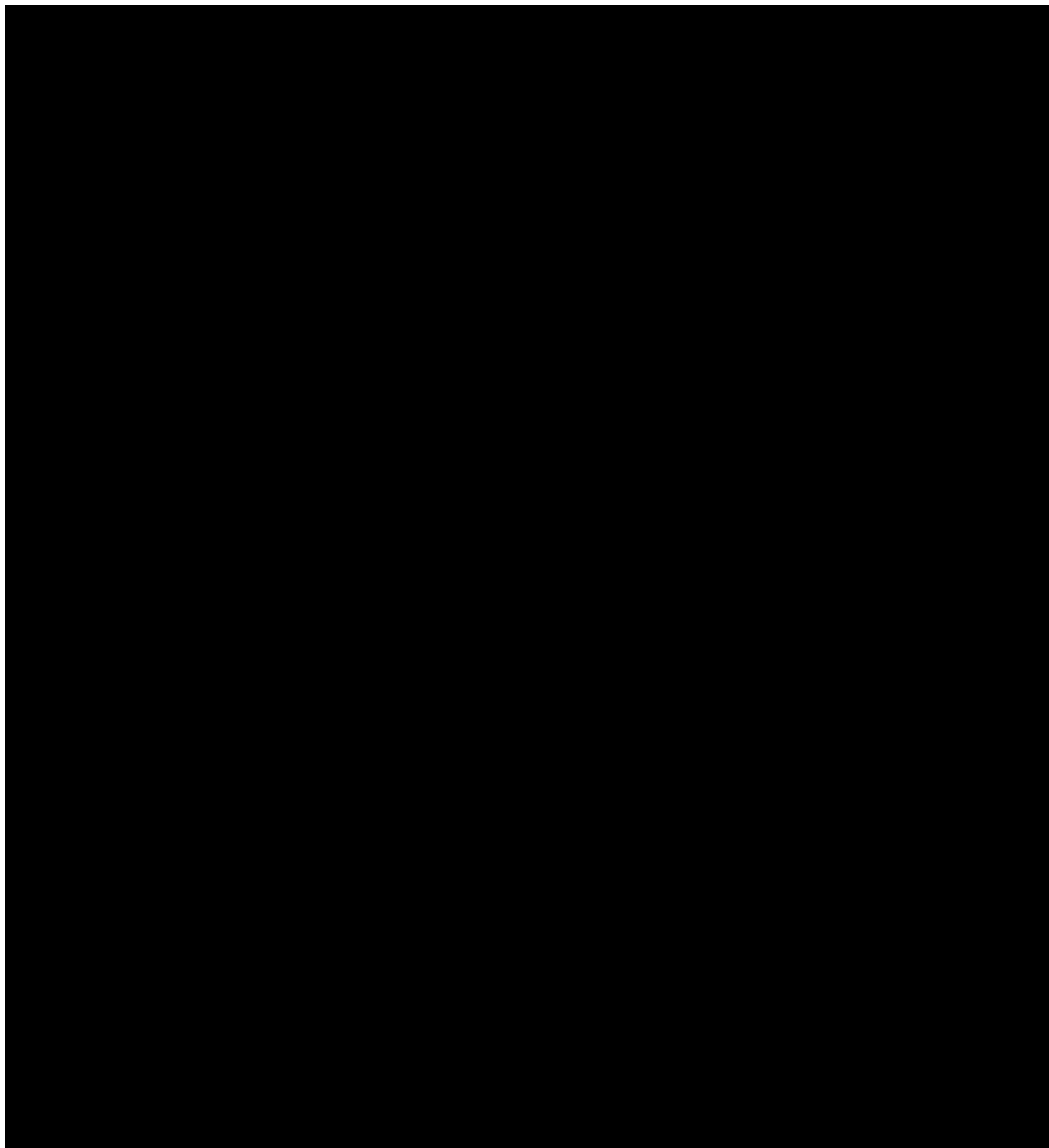
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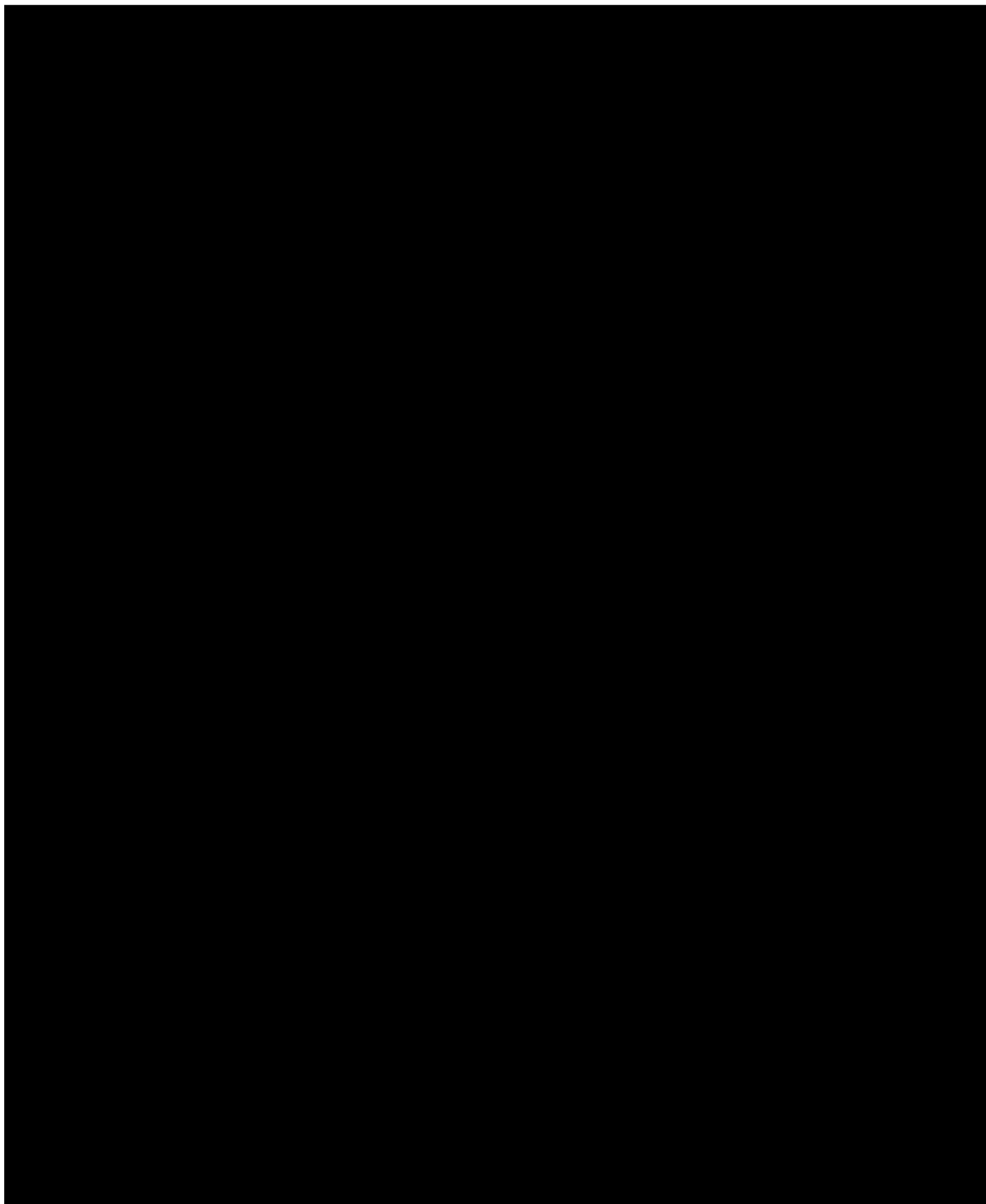
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Next Review Date: 11/16/2023			

1 PURPOSE

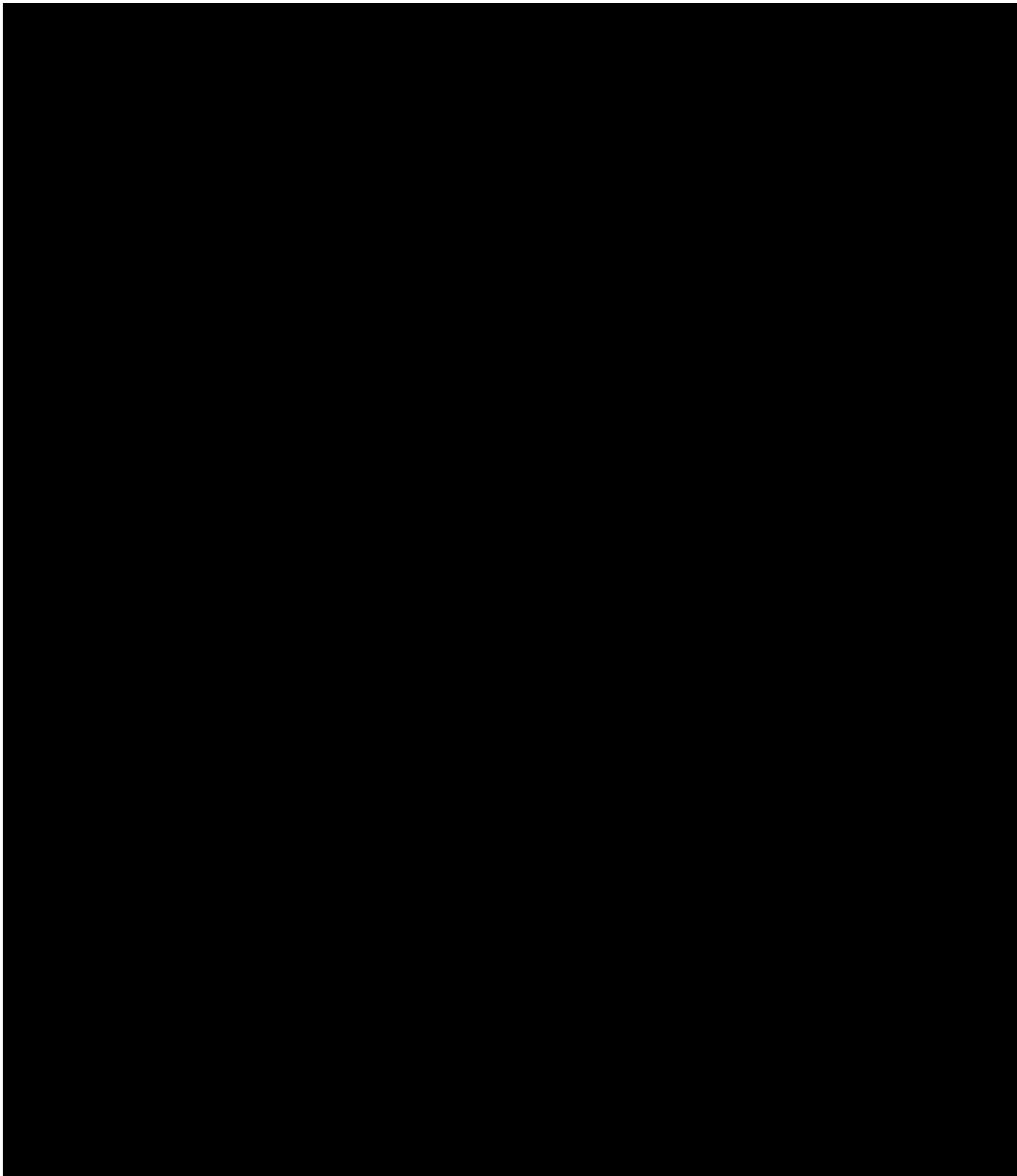
The Galveston Bay Refinery was designed for warm weather operations. However, severe cold weather is periodically experienced in this area that can have a major impact on refinery operations if not dealt with effectively. The objective is to improve the refinery's ability to survive severe cold weather with minimum personal and process safety risk, environmental impact, and economic loss.



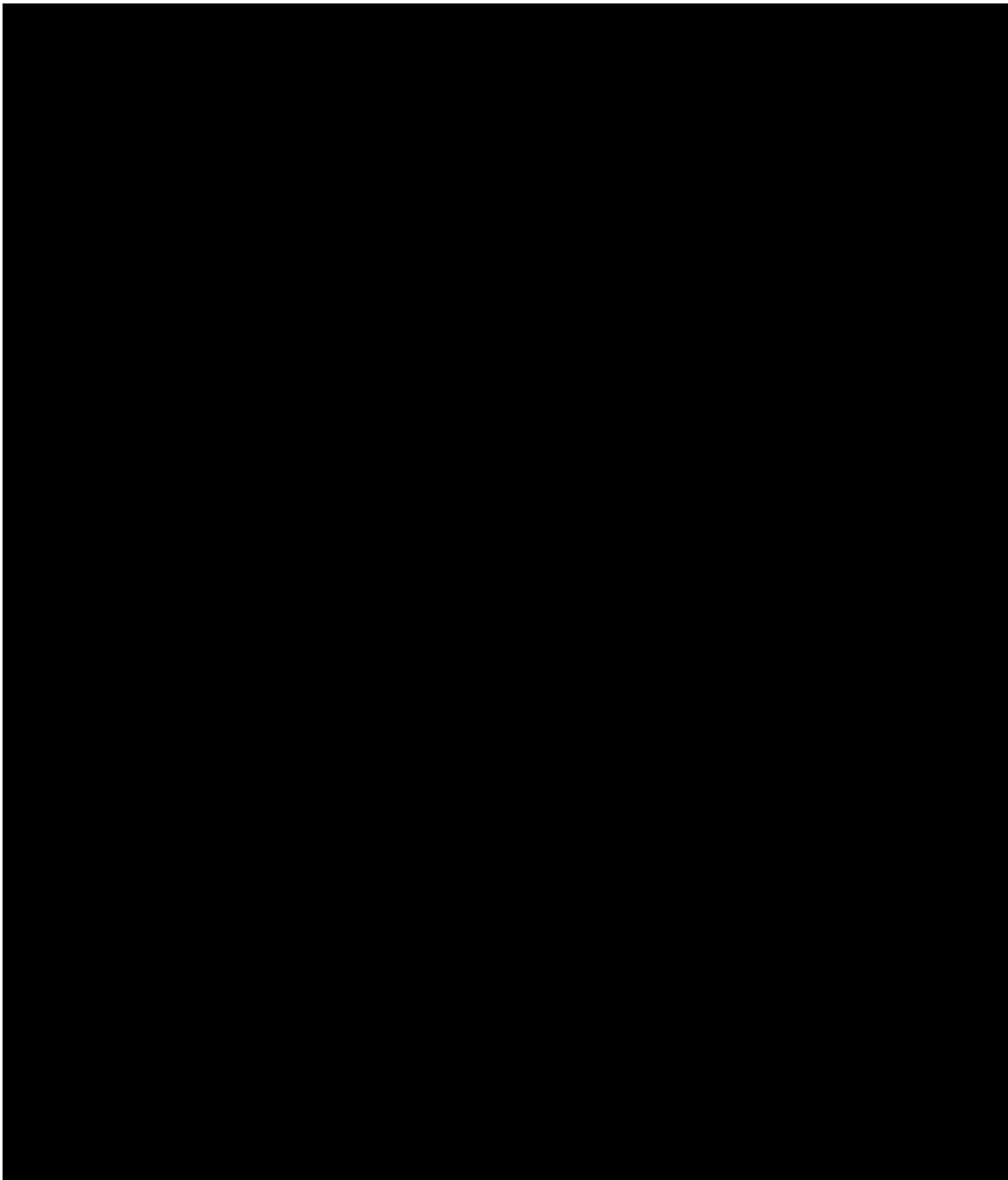
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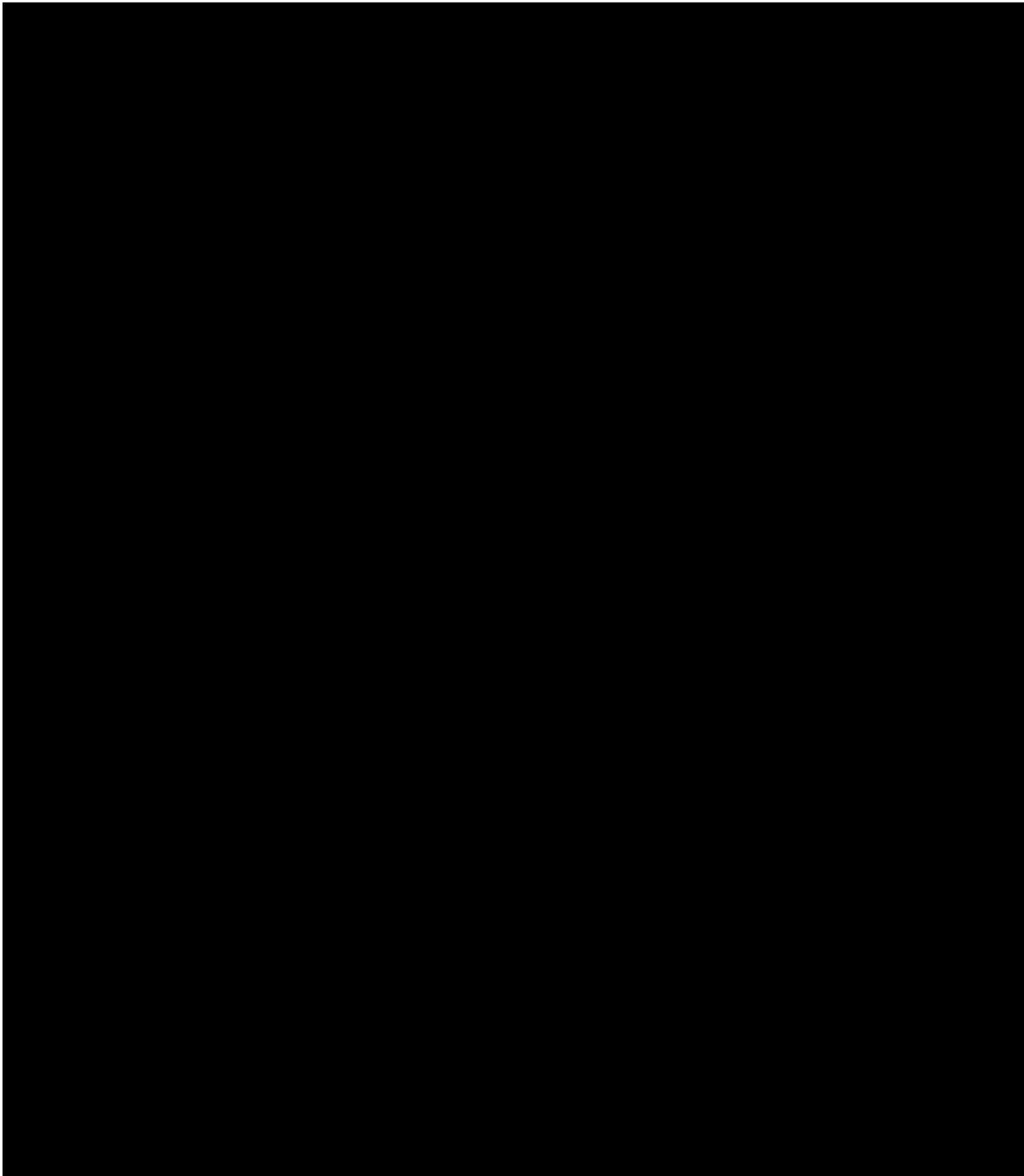
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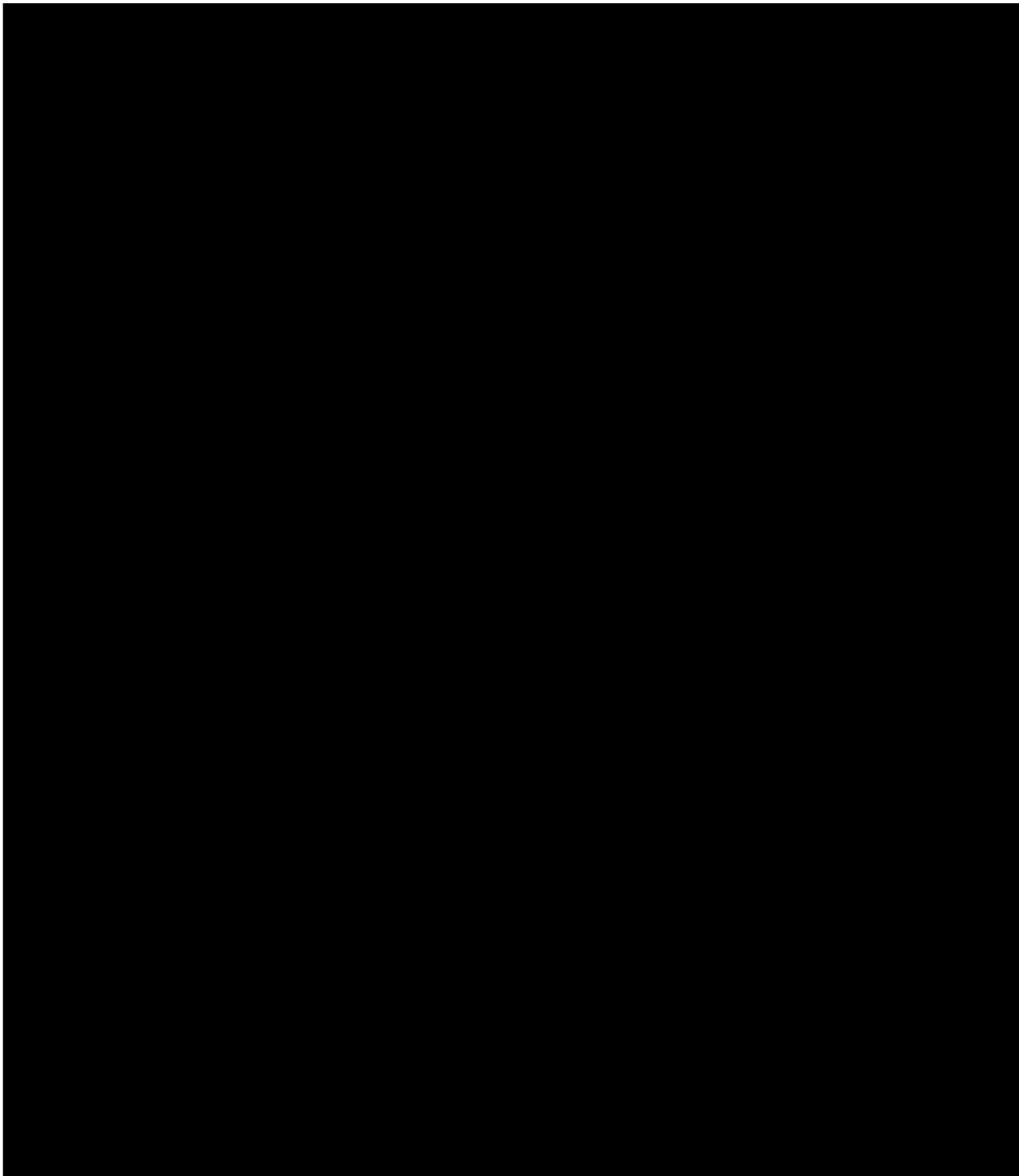
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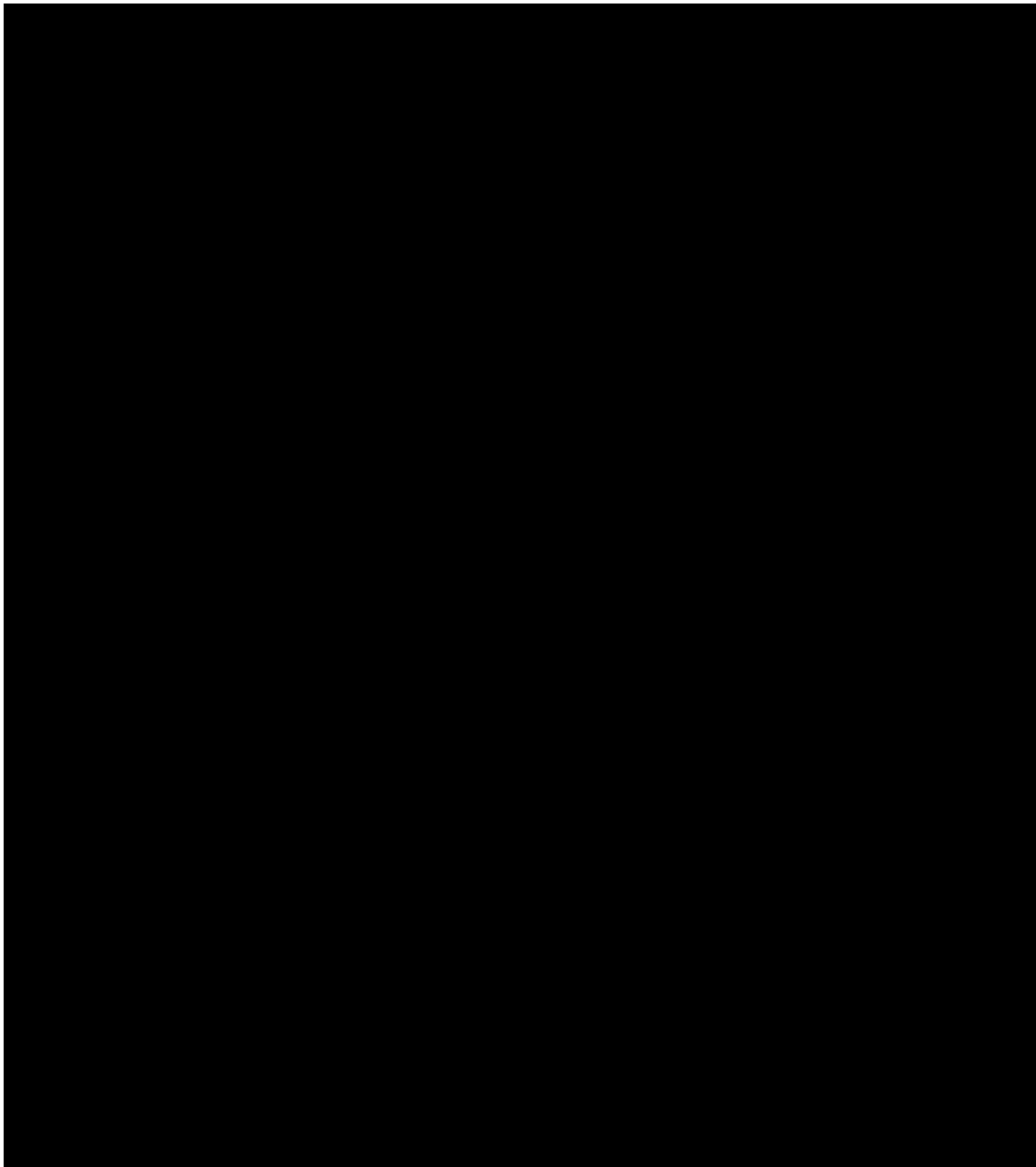
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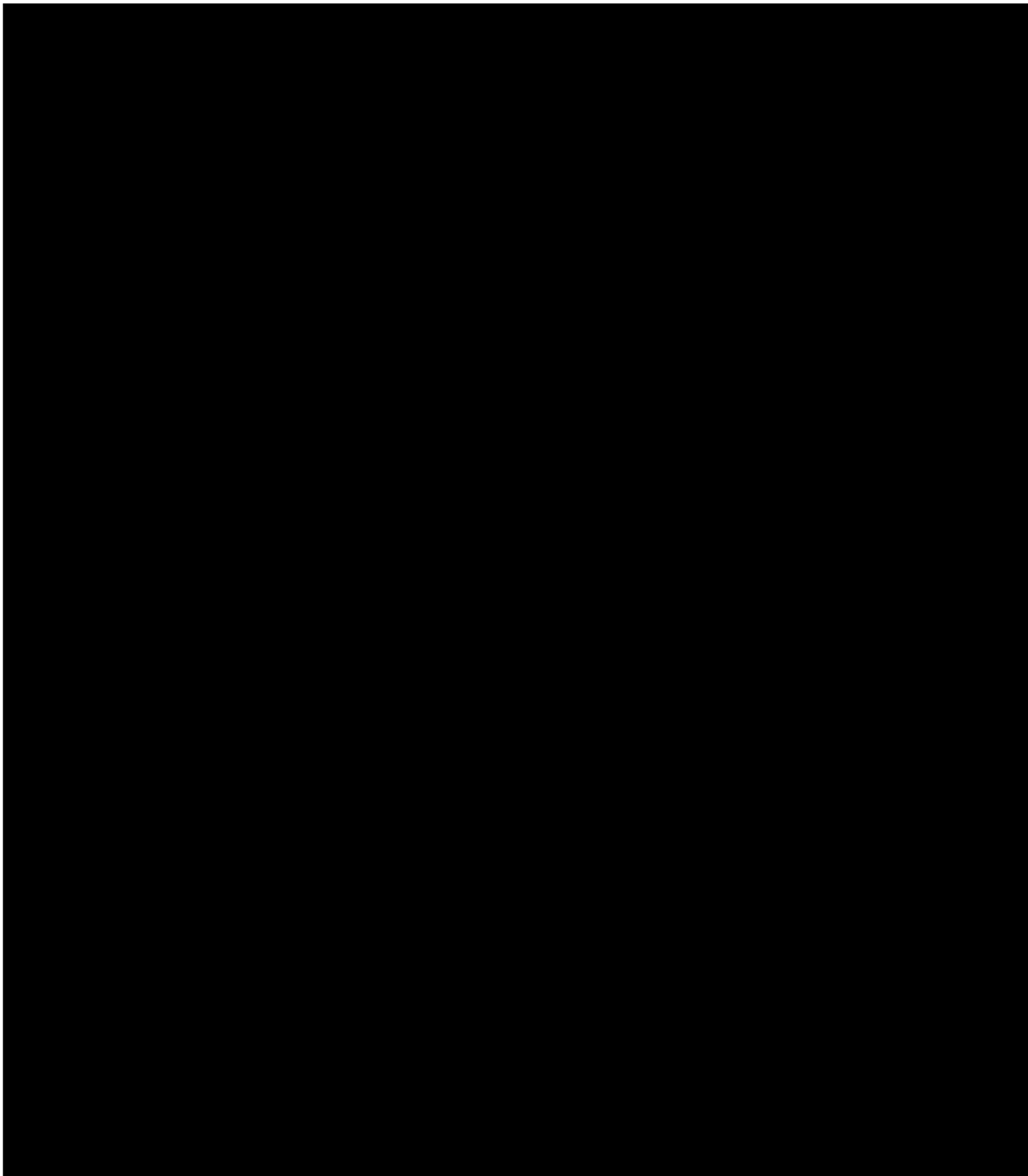
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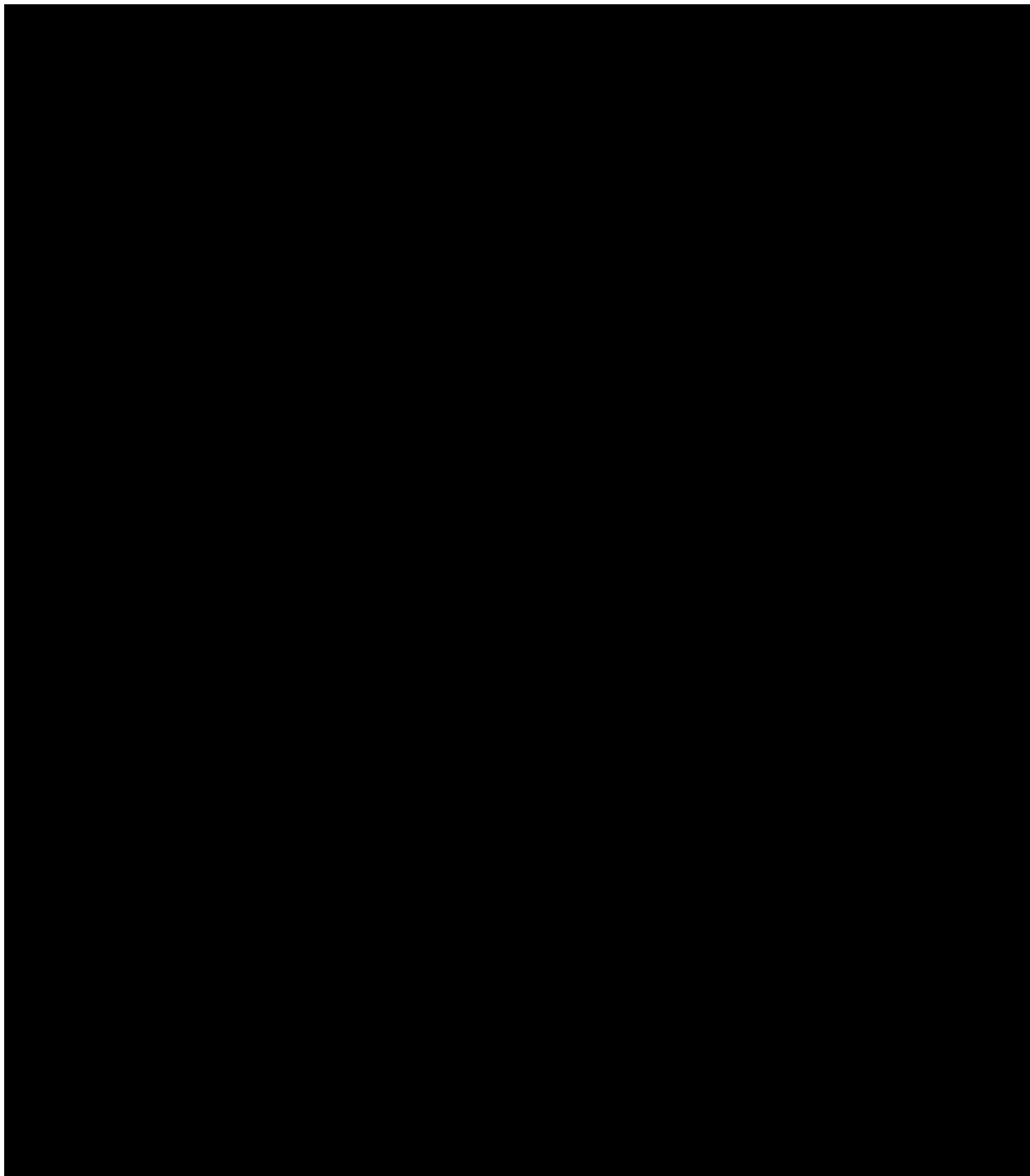


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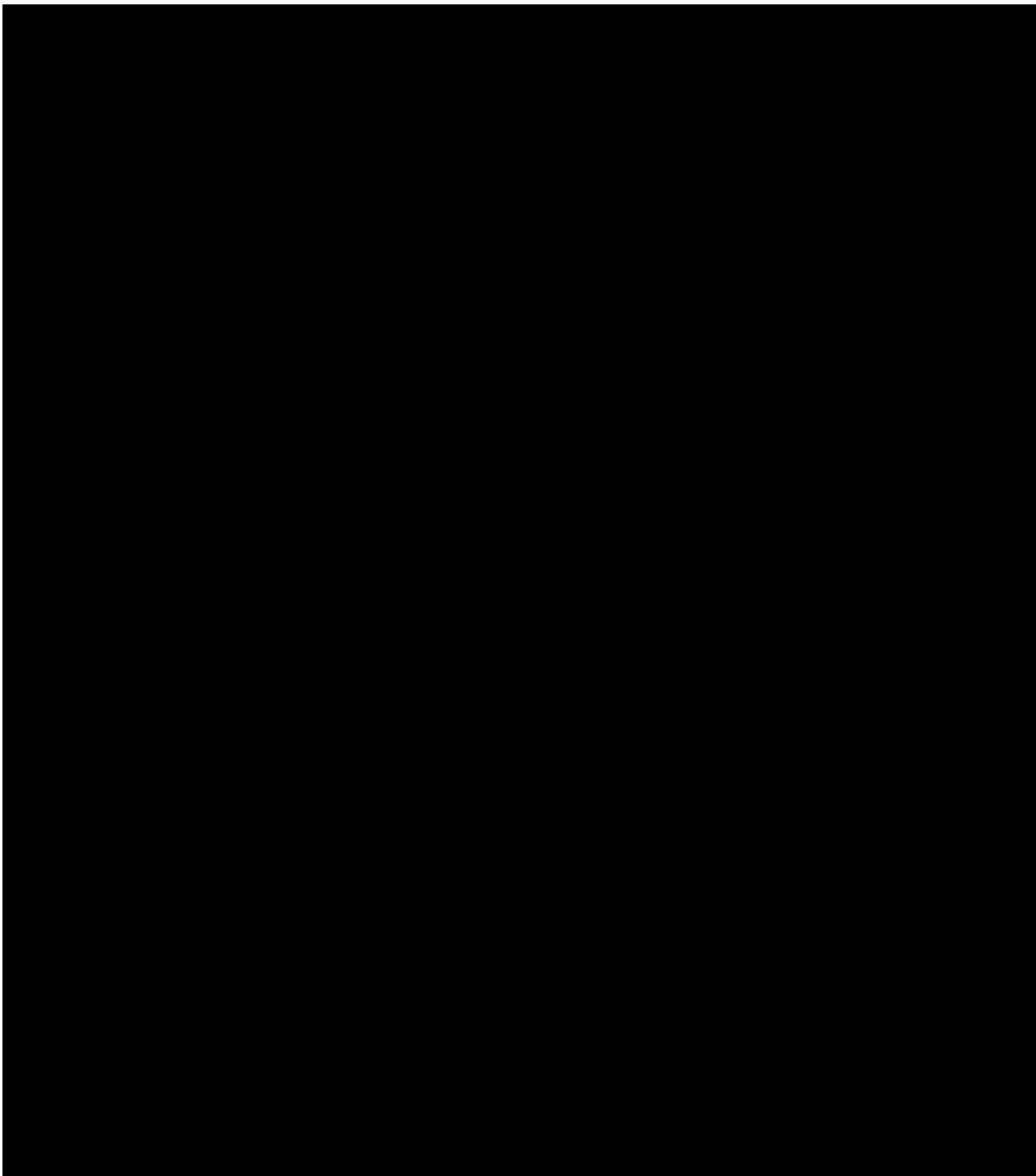
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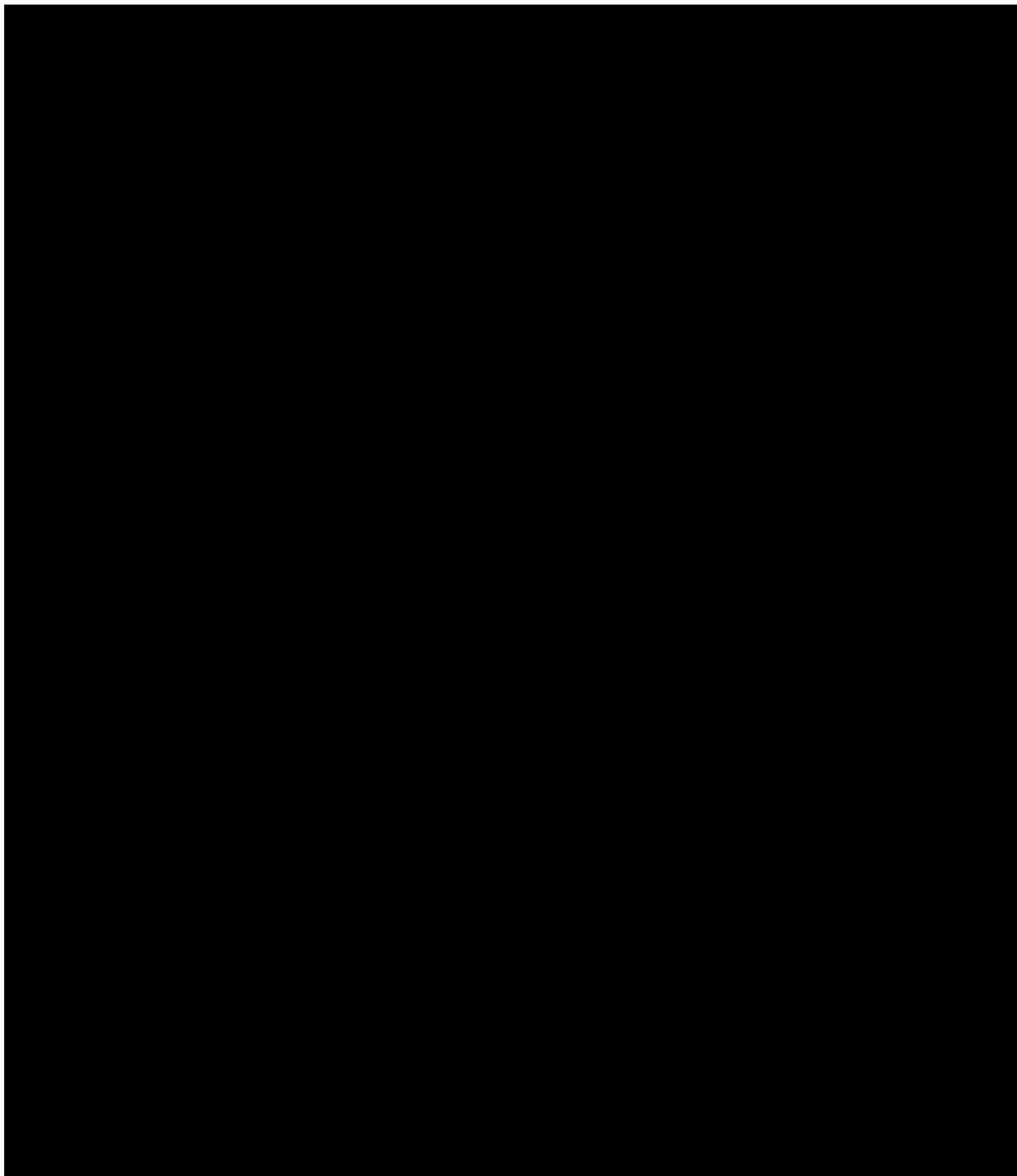
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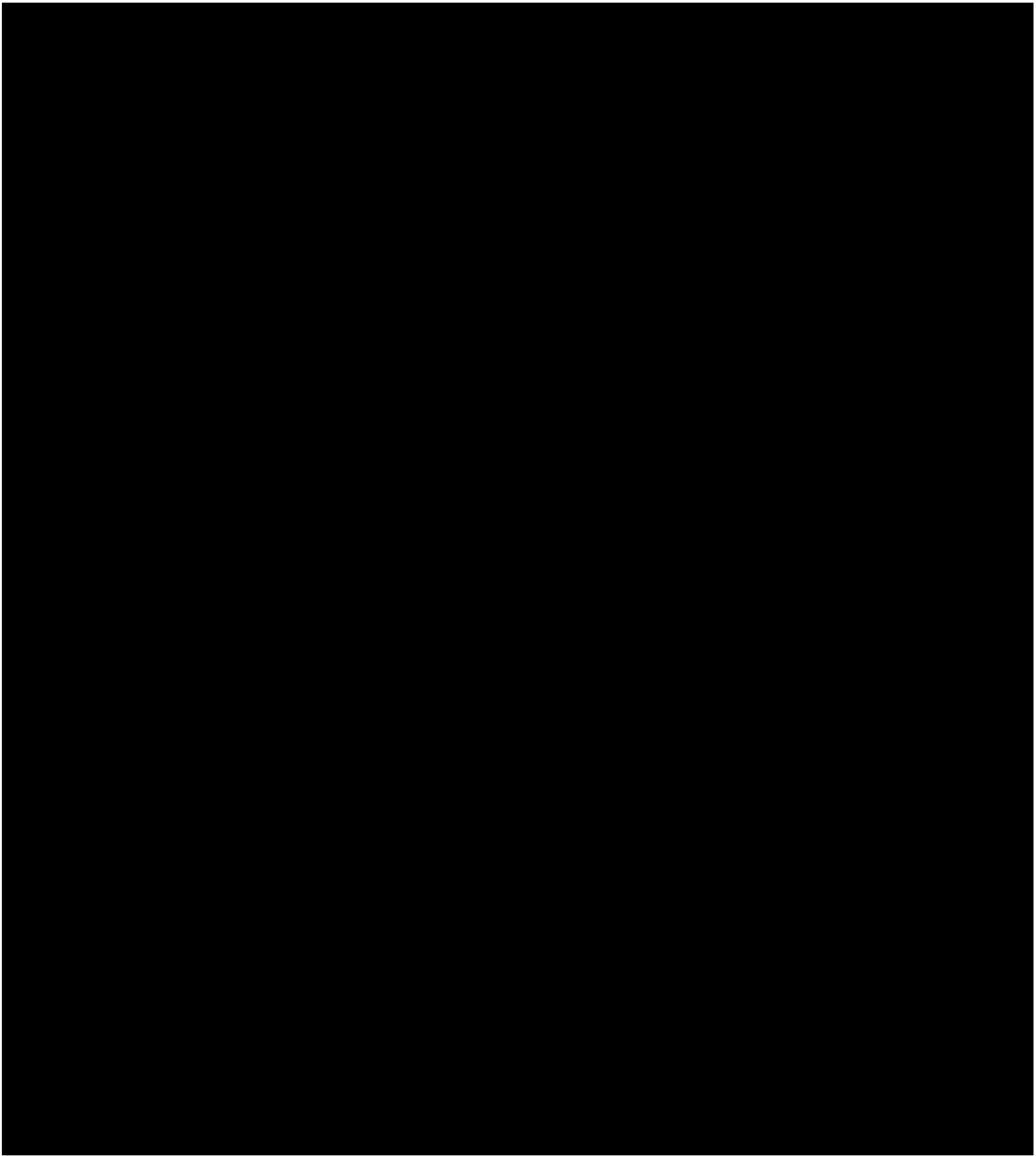
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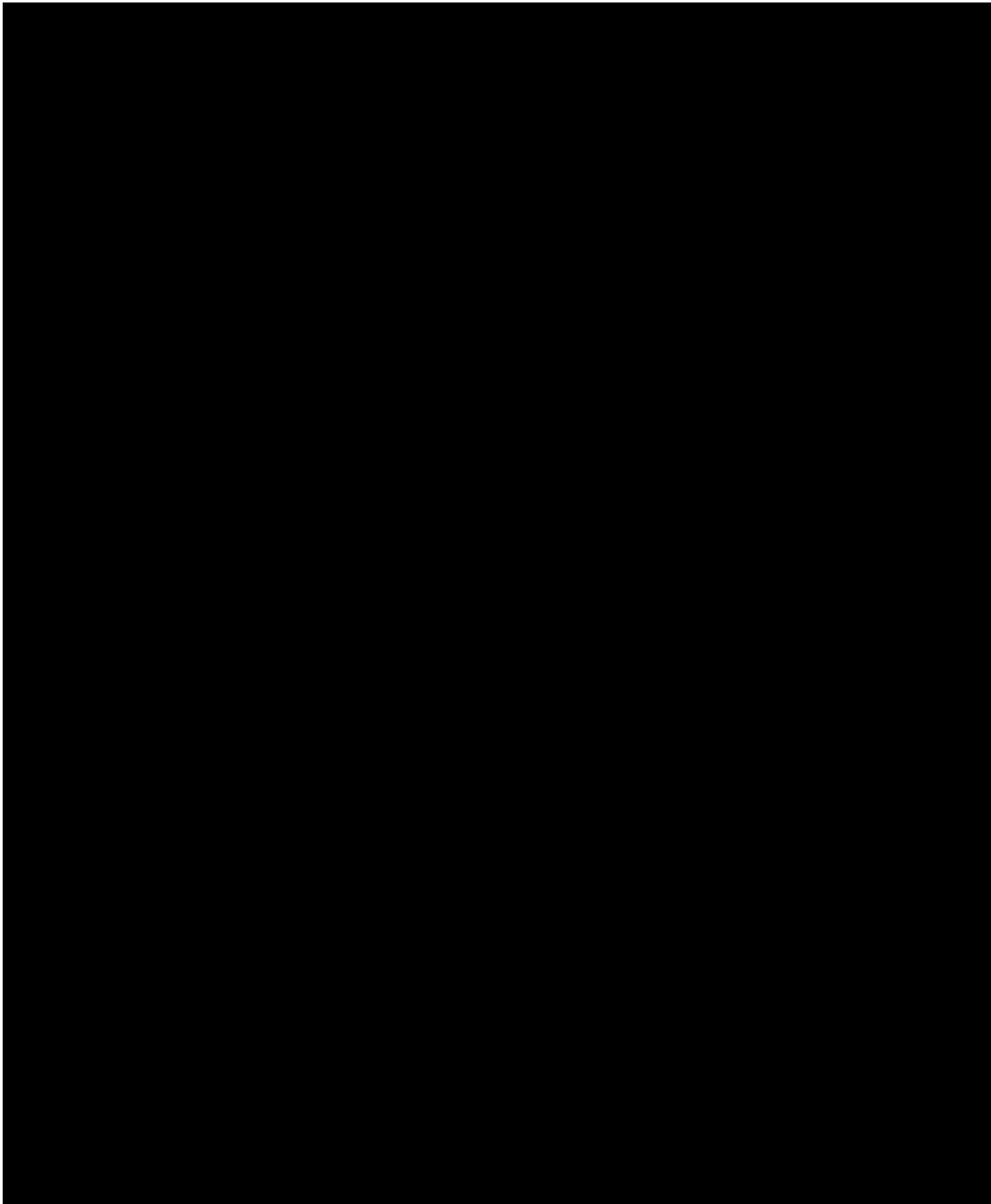
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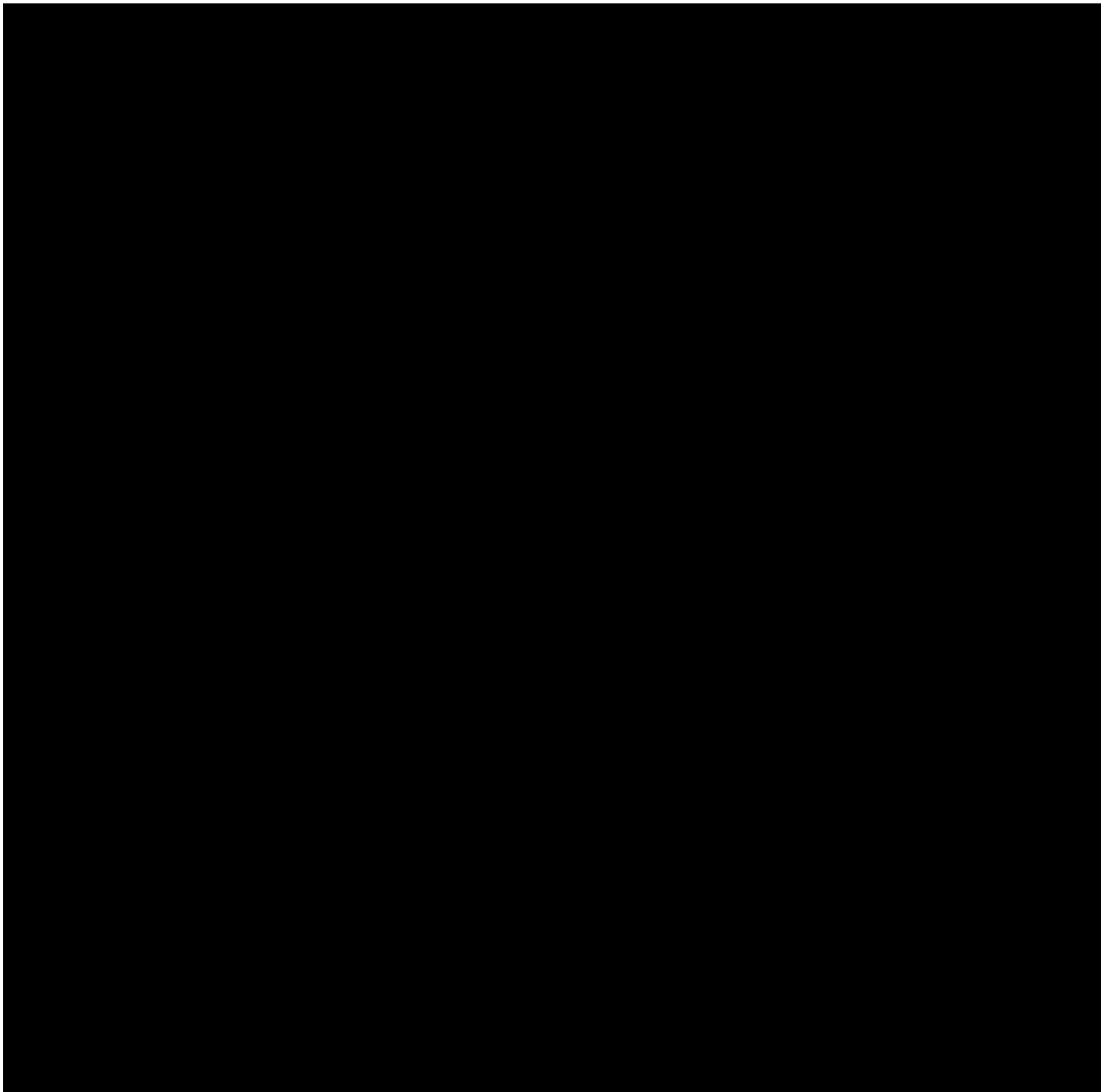
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 2	Page 1 of 18
Approved By: Jack Skufca		Galveston Bay Refinery	
Date Approved: 01/31/2020		Next Review Date: 01/31/2025	Effective Date: 01/31/2020



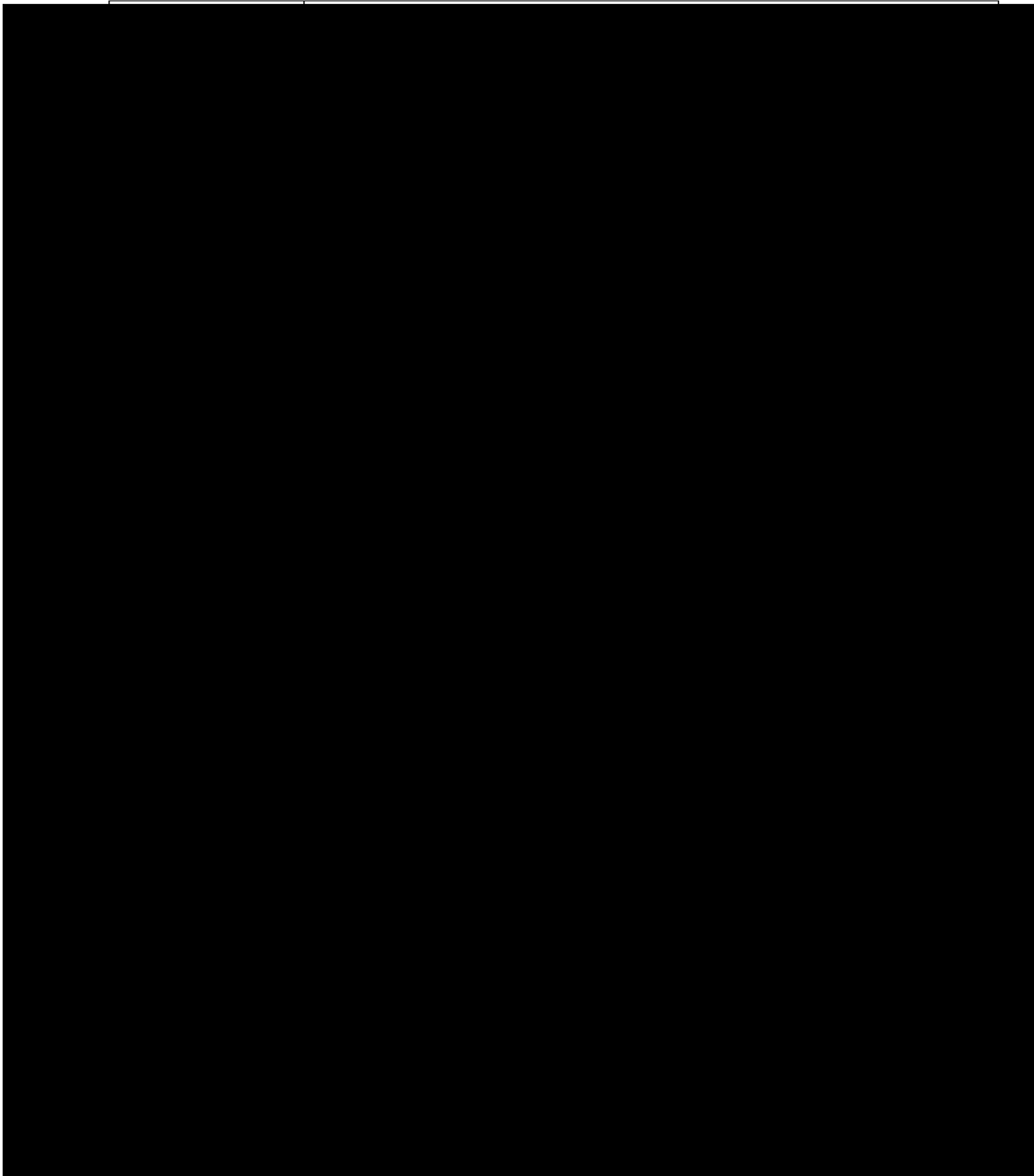
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1 PURPOSE

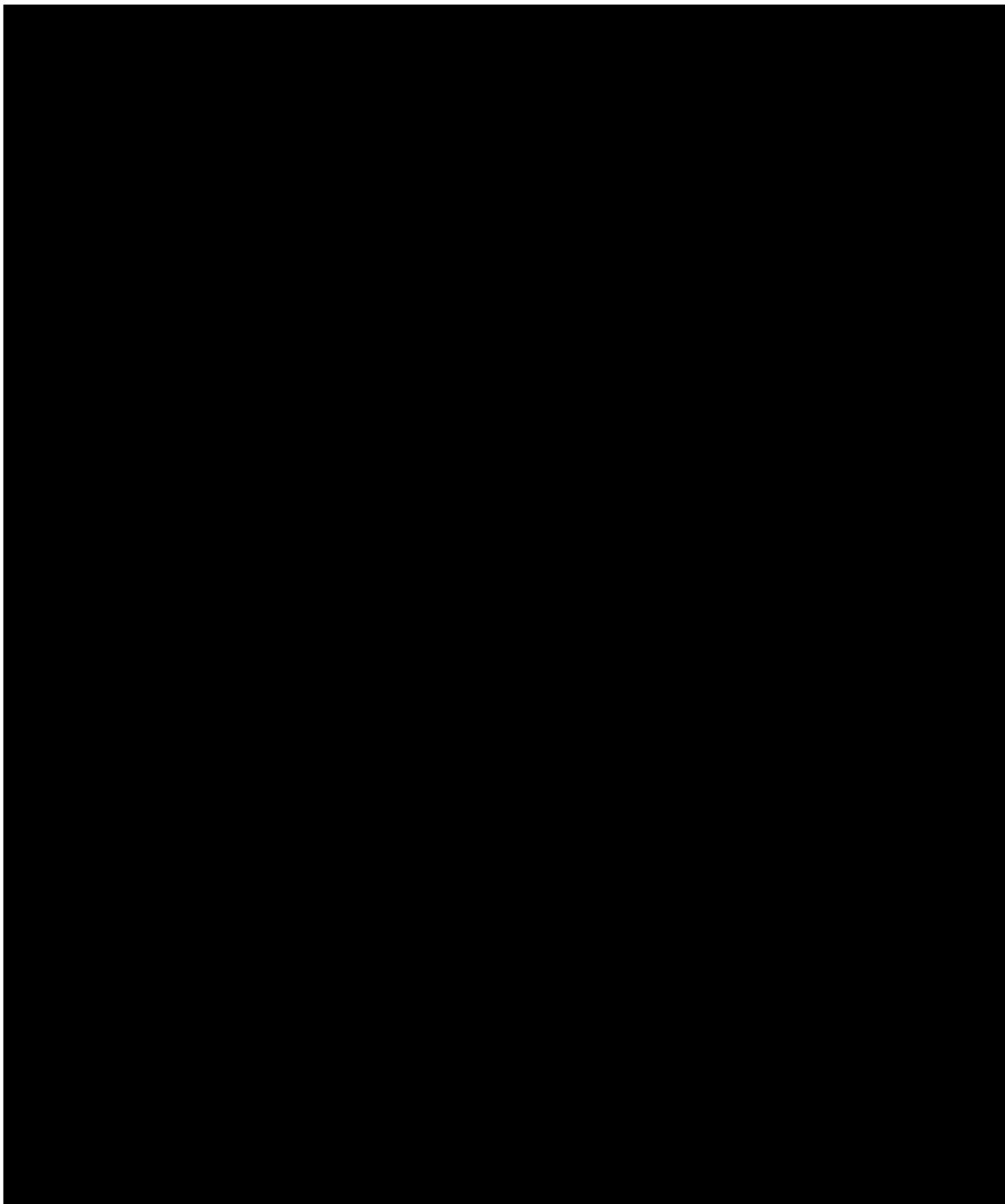
- 1.1 This Procedure provides detailed instructions to prepare GP2 for potential freezing or near freezing weather conditions.



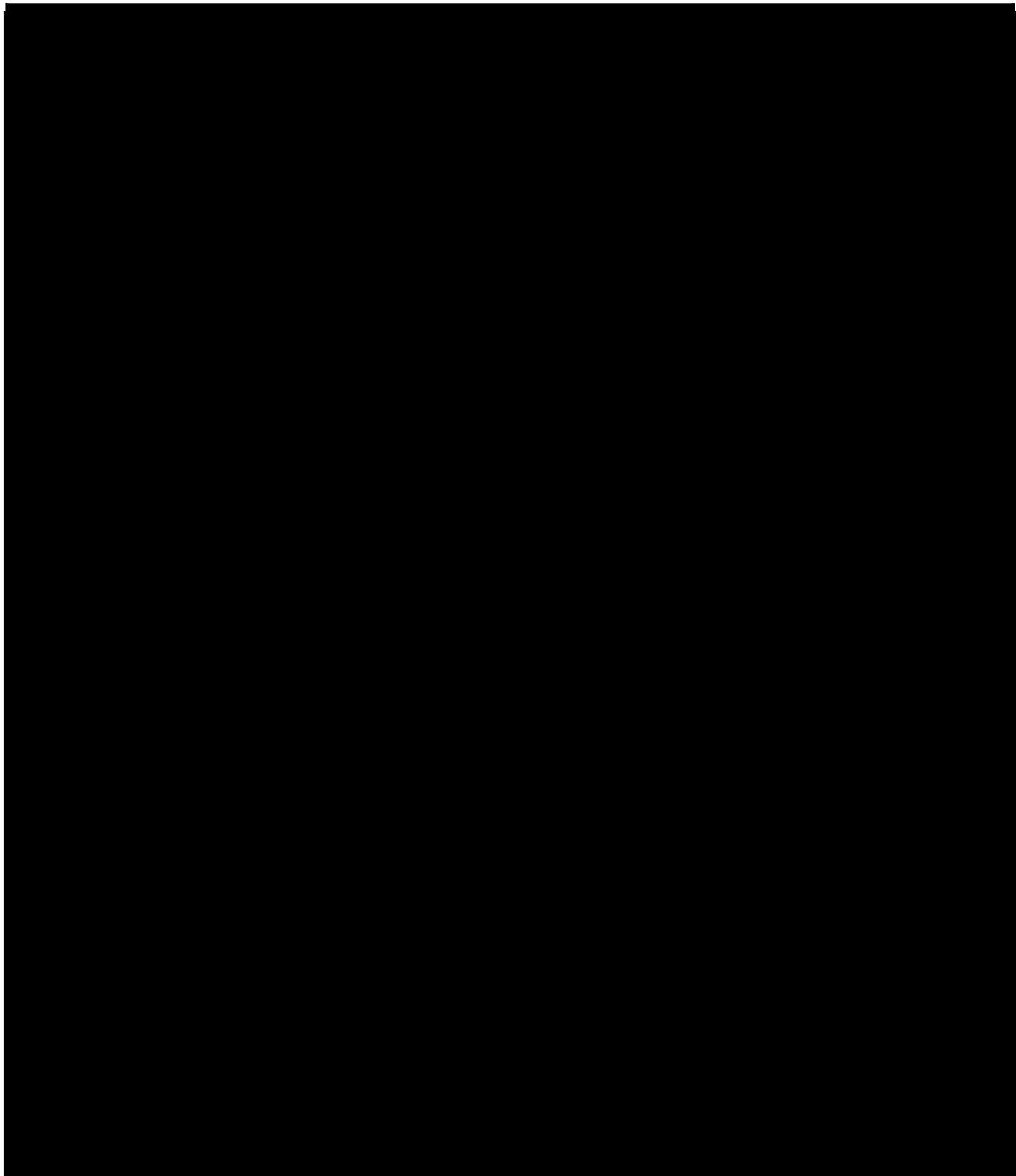
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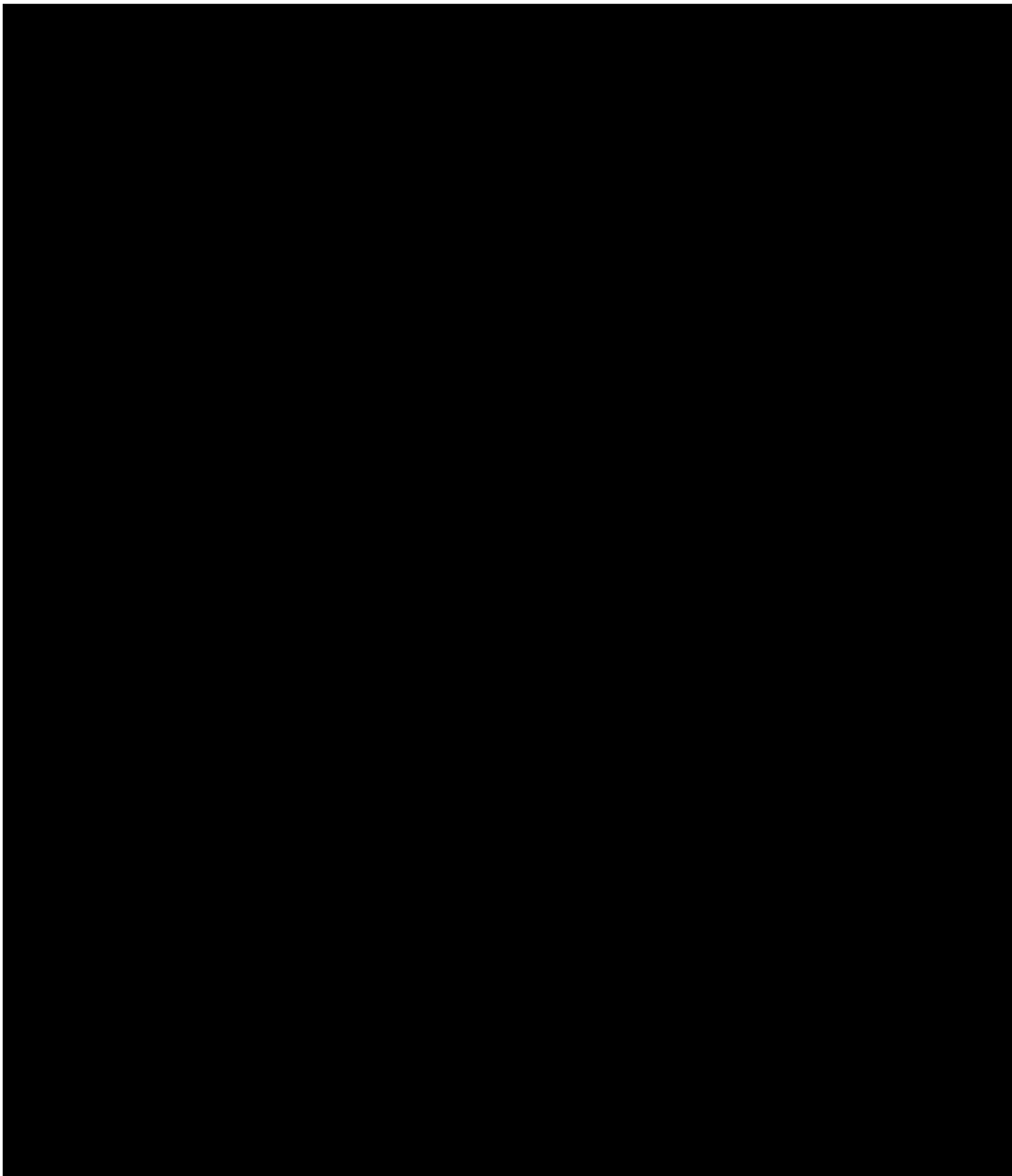
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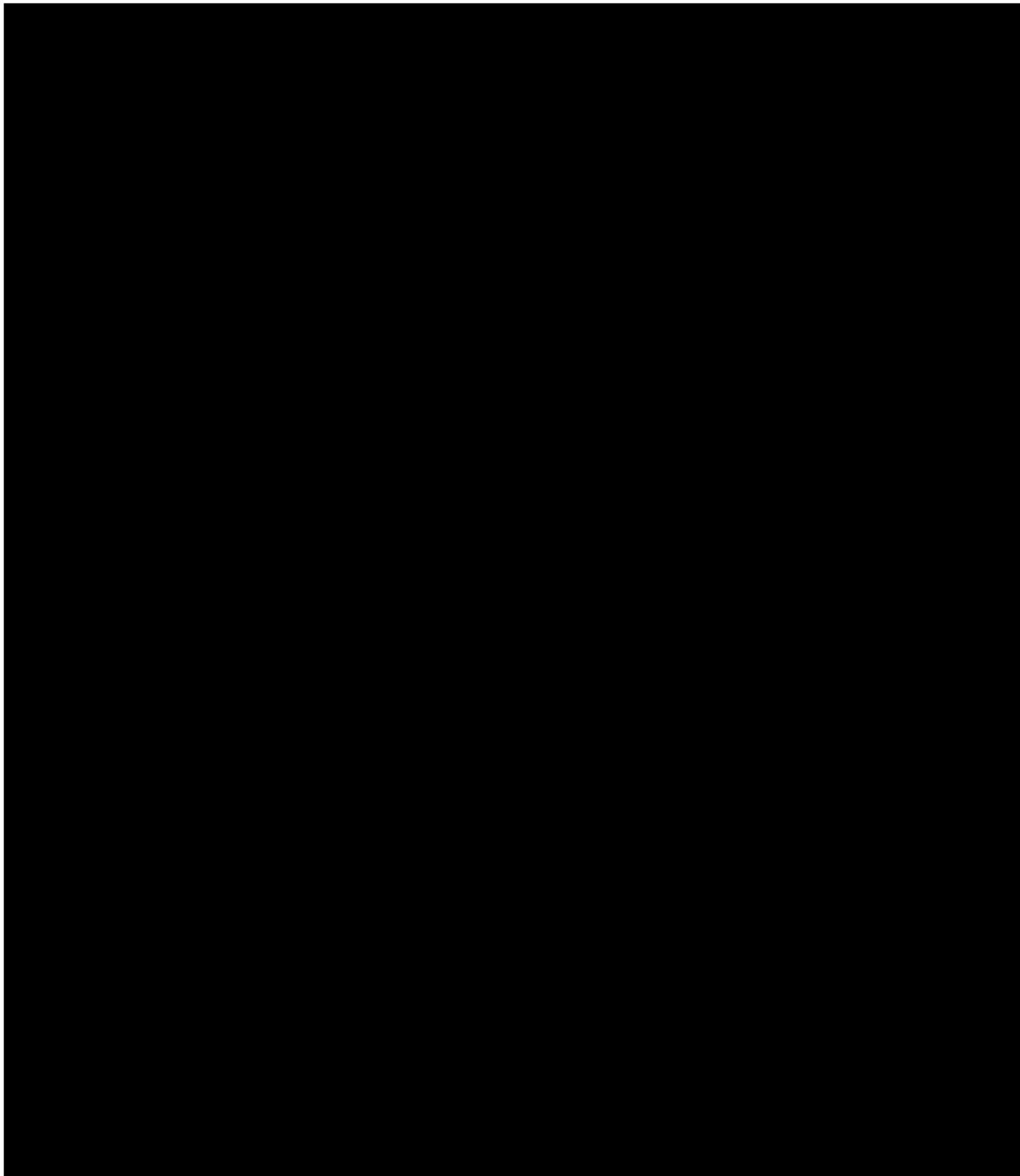
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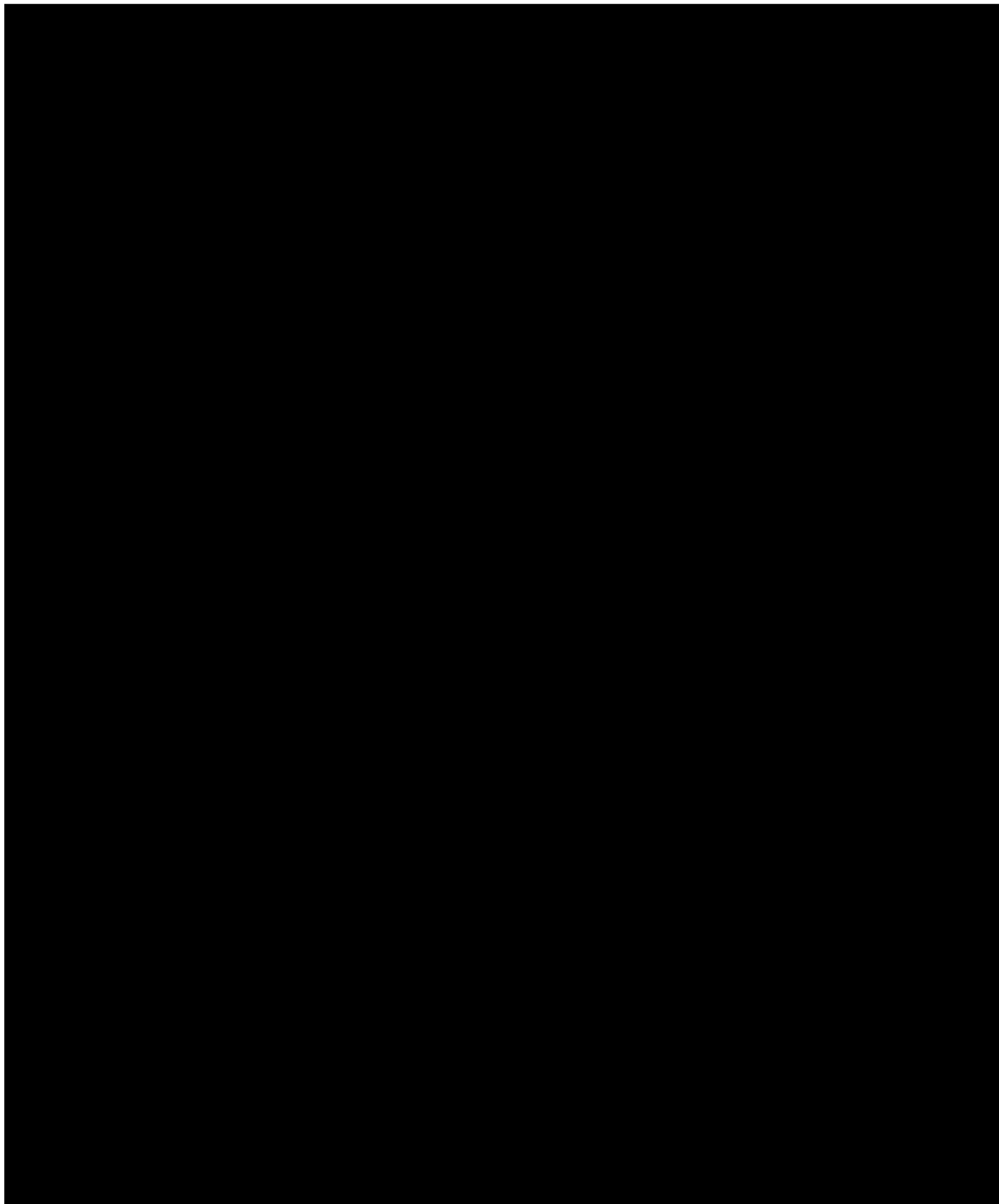
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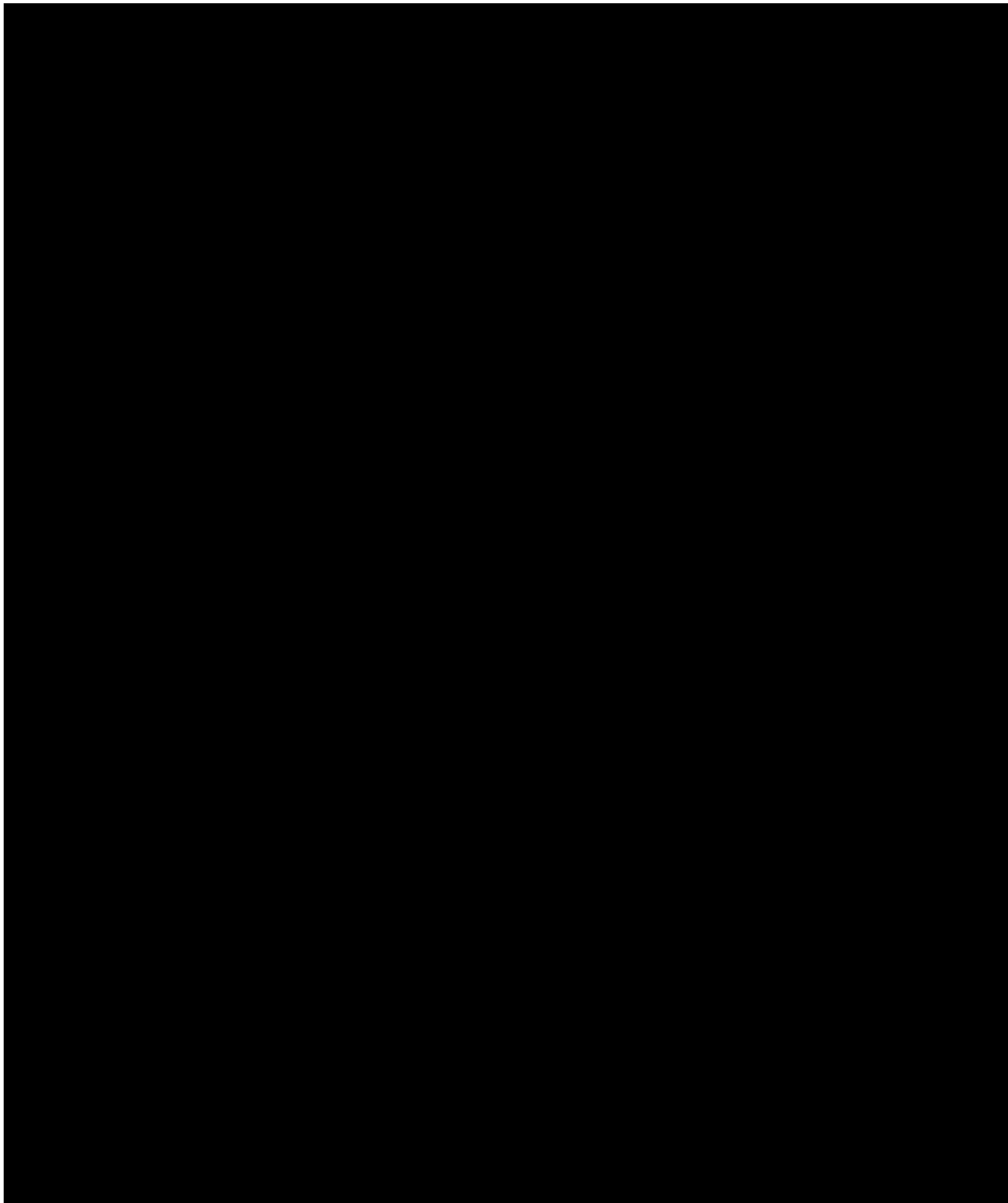
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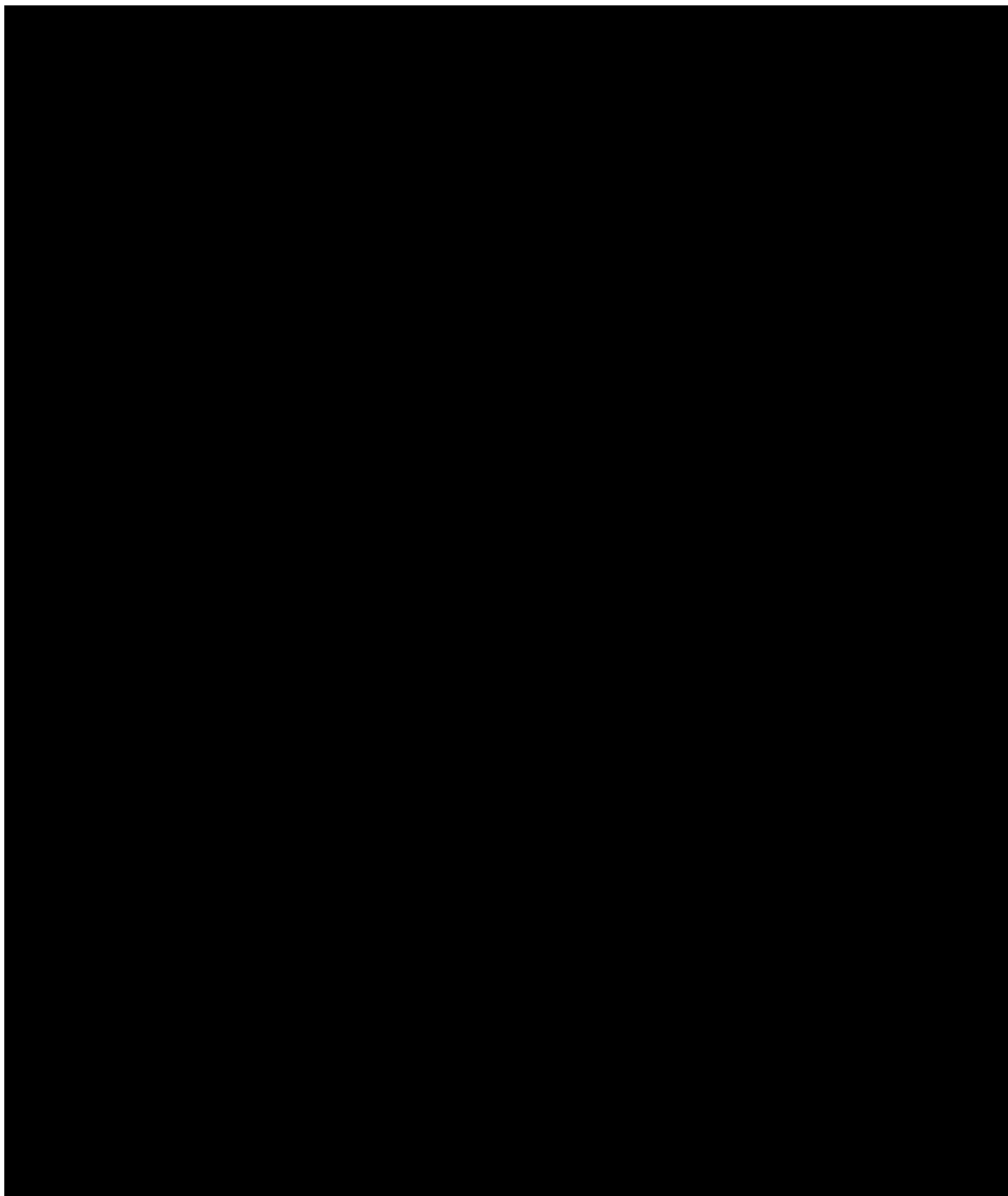
Authored By: Marshall Dunham	<u>Blanchard Refining Company LLC</u> GP2 FREEZE PROTECTION PREPARATION	Doc. No.: ROP-0501-5044	
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Approved By: Jack Skufca			
Date Approved: 01/31/2020	Next Review Date: 01/31/2025	Effective Date: 01/31/2020	



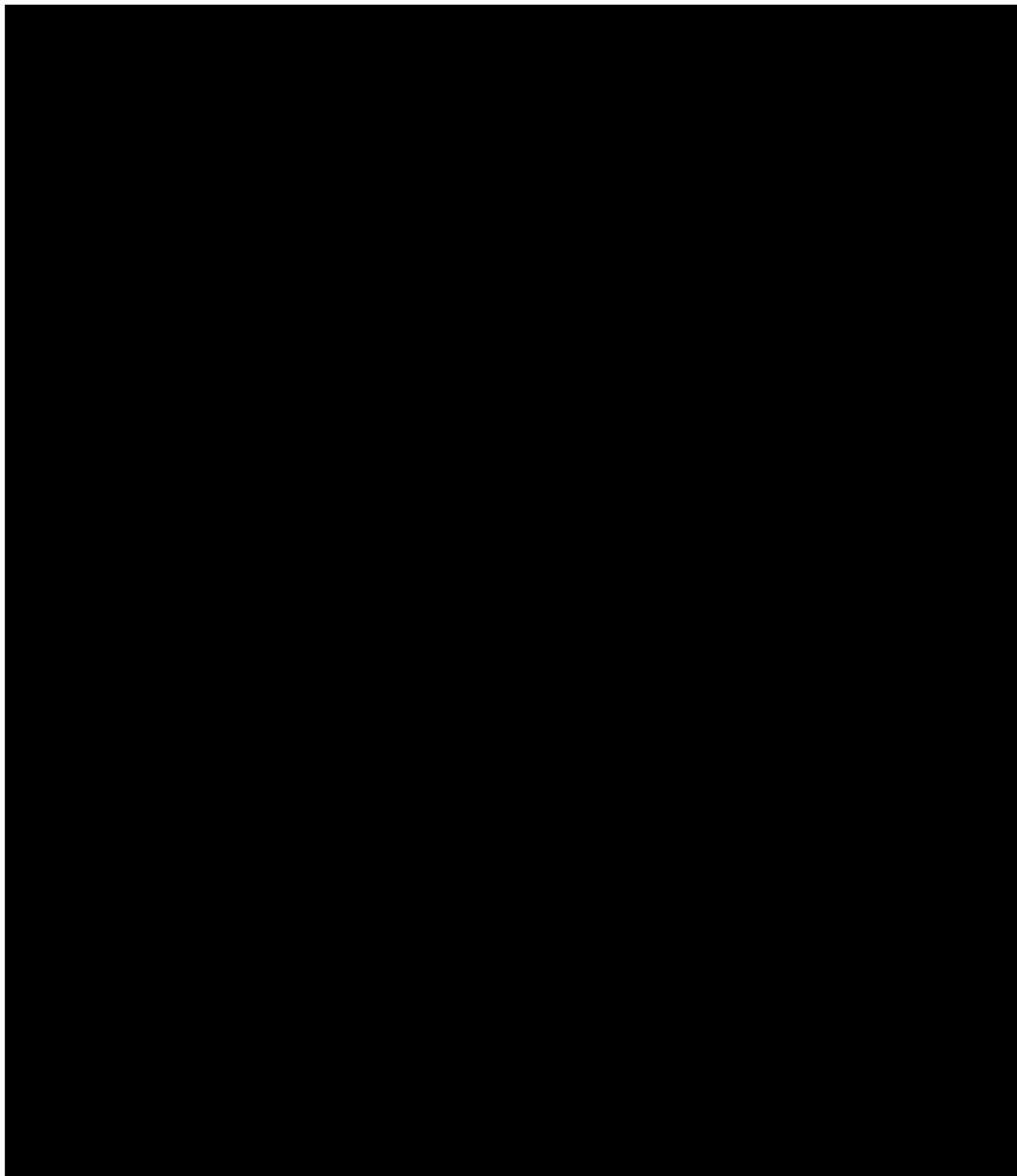
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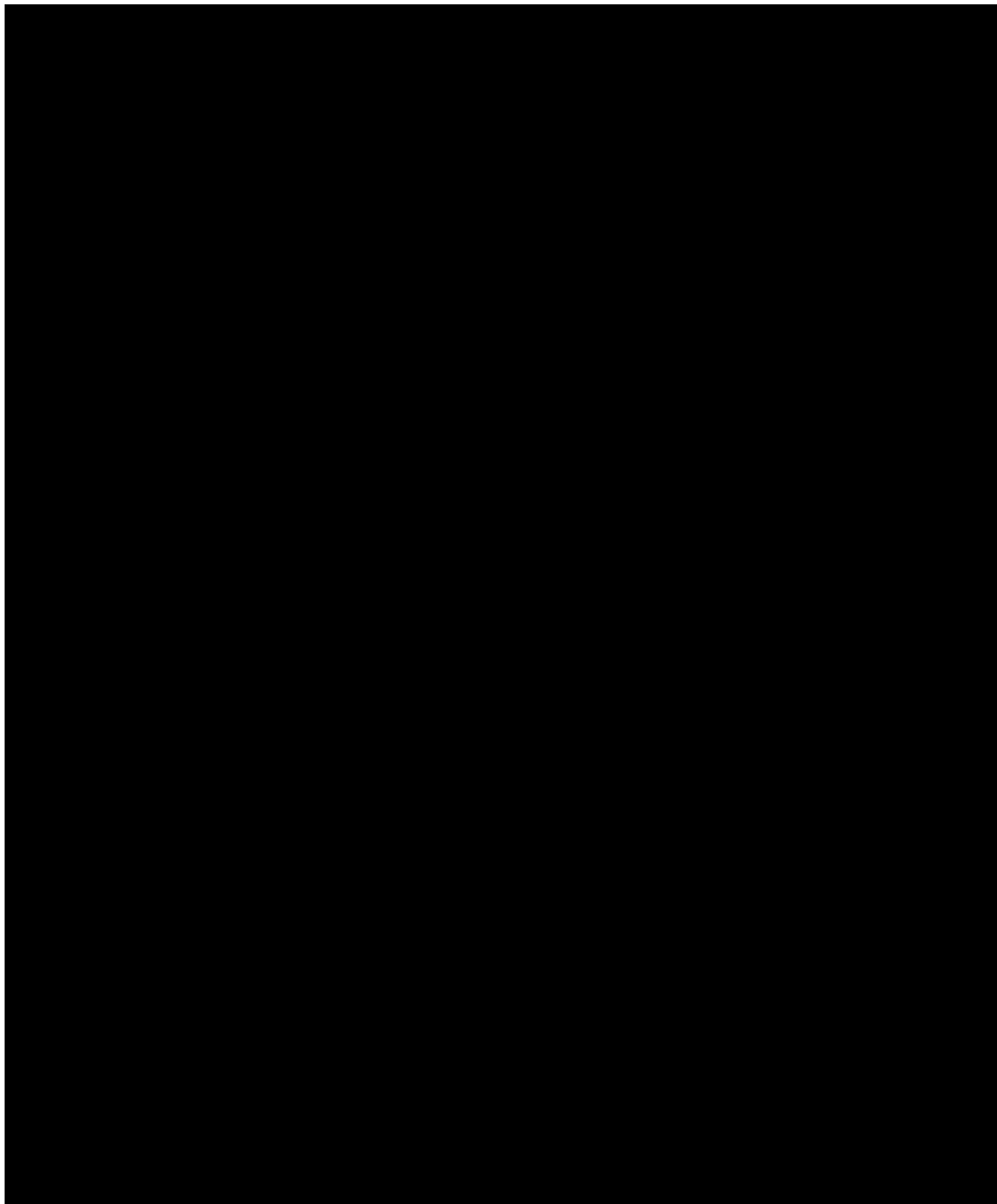
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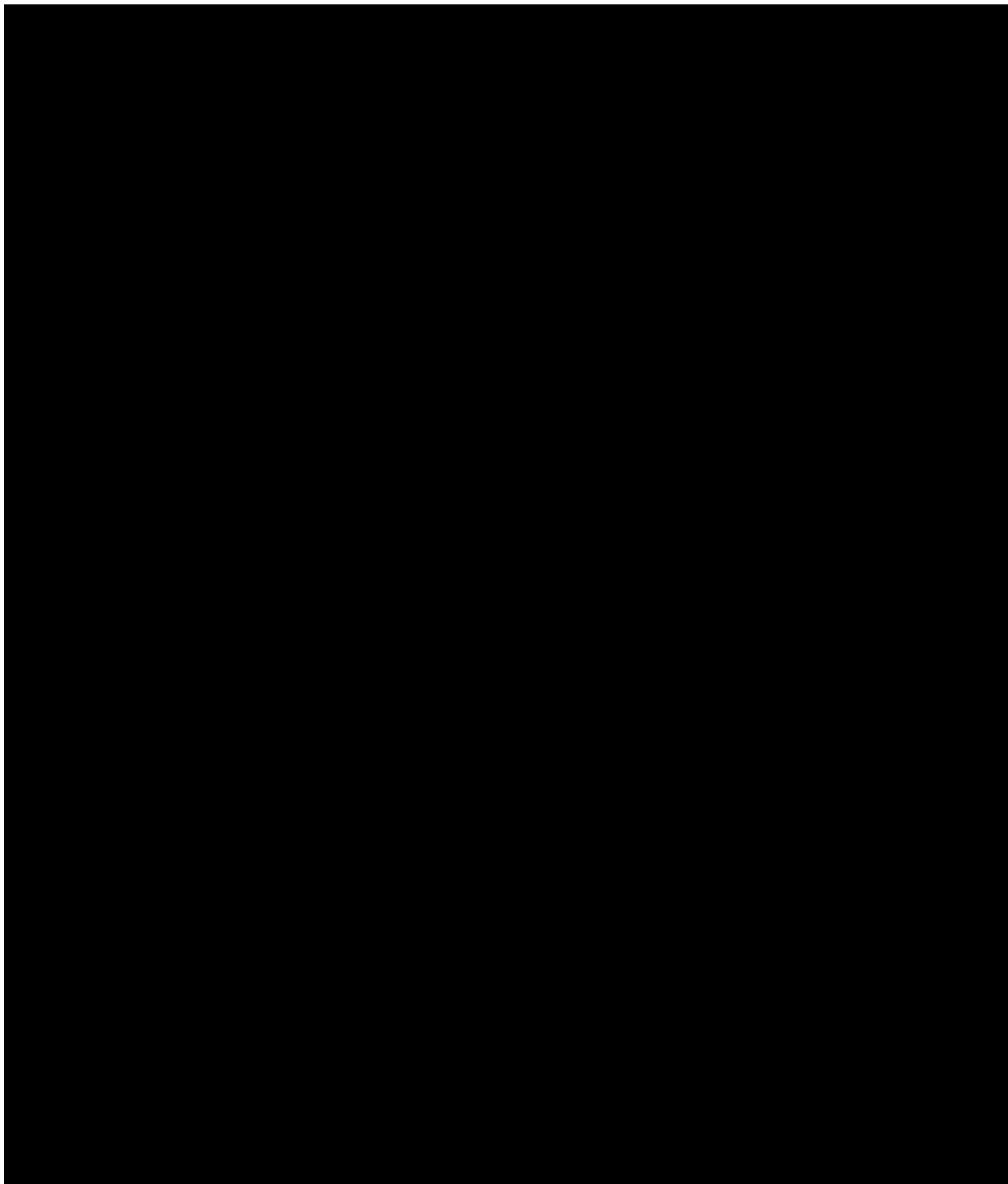
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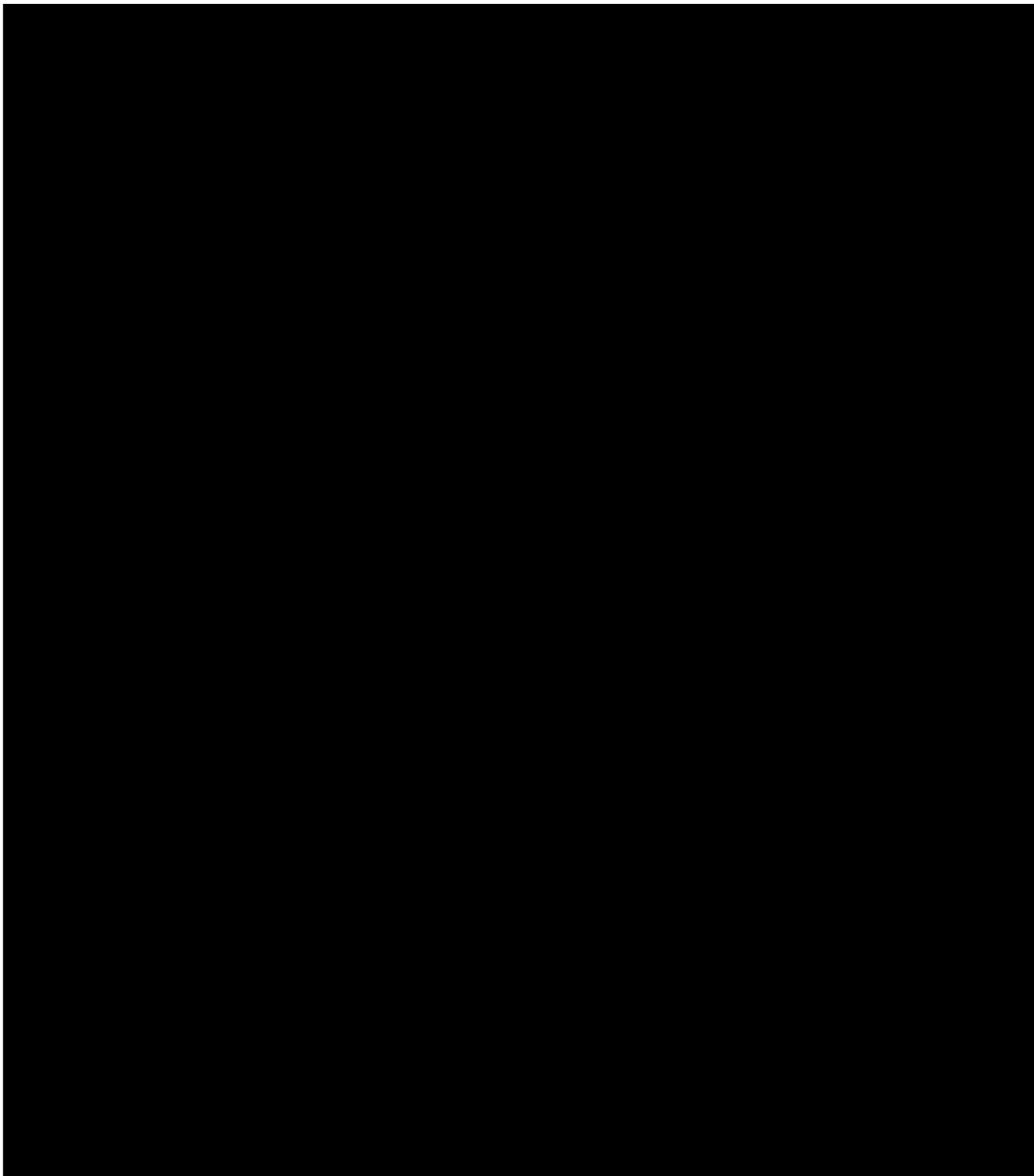
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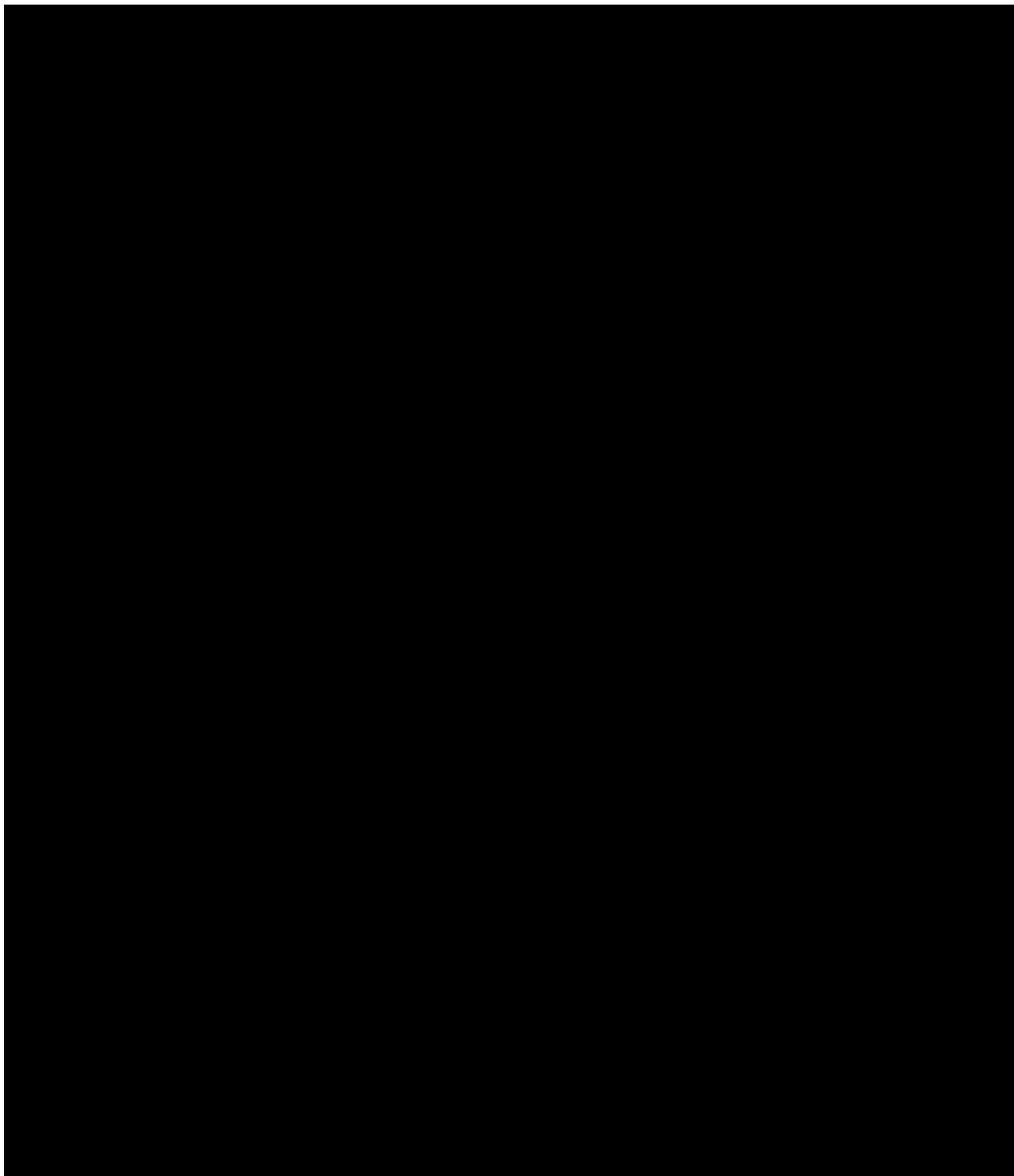
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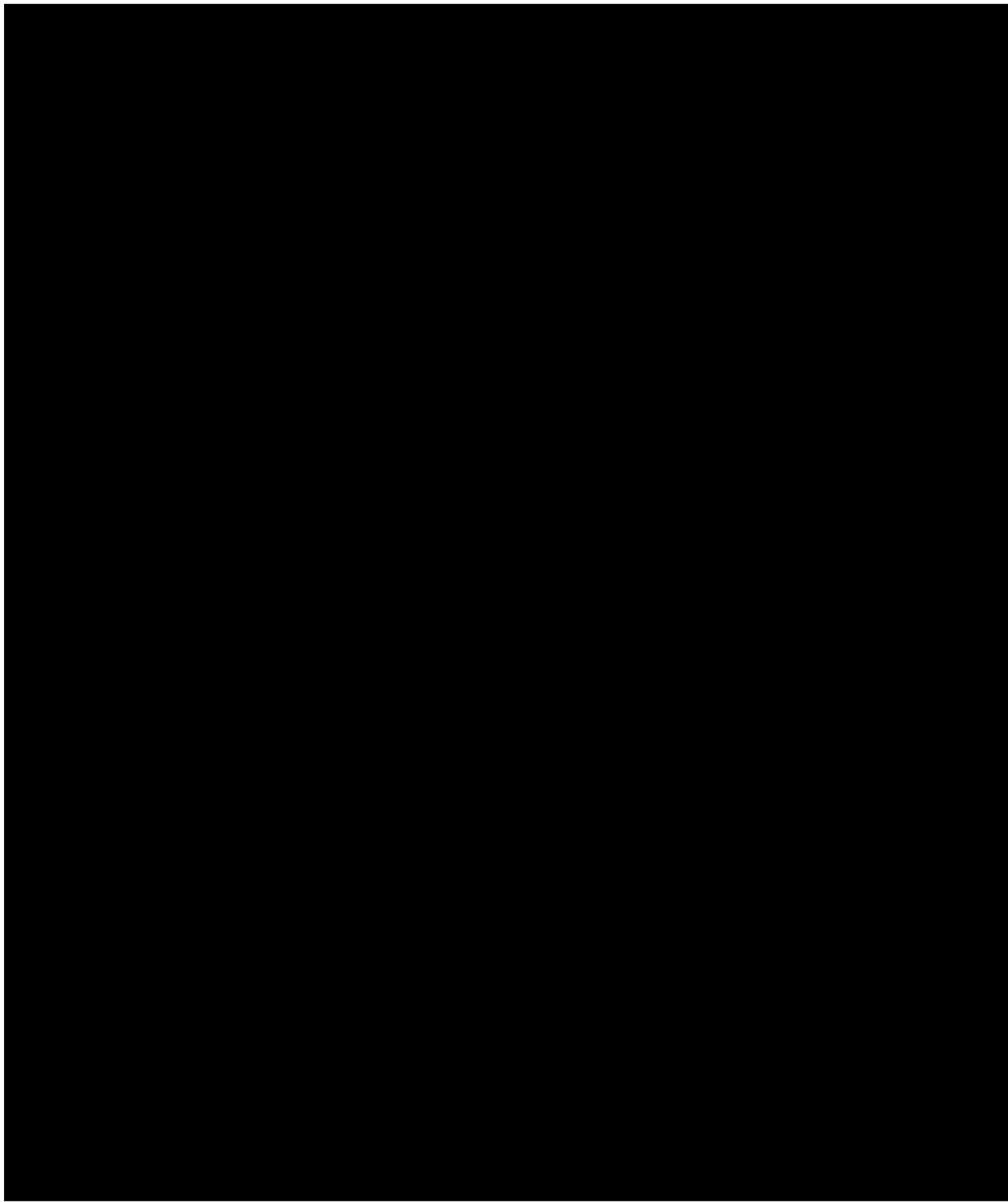
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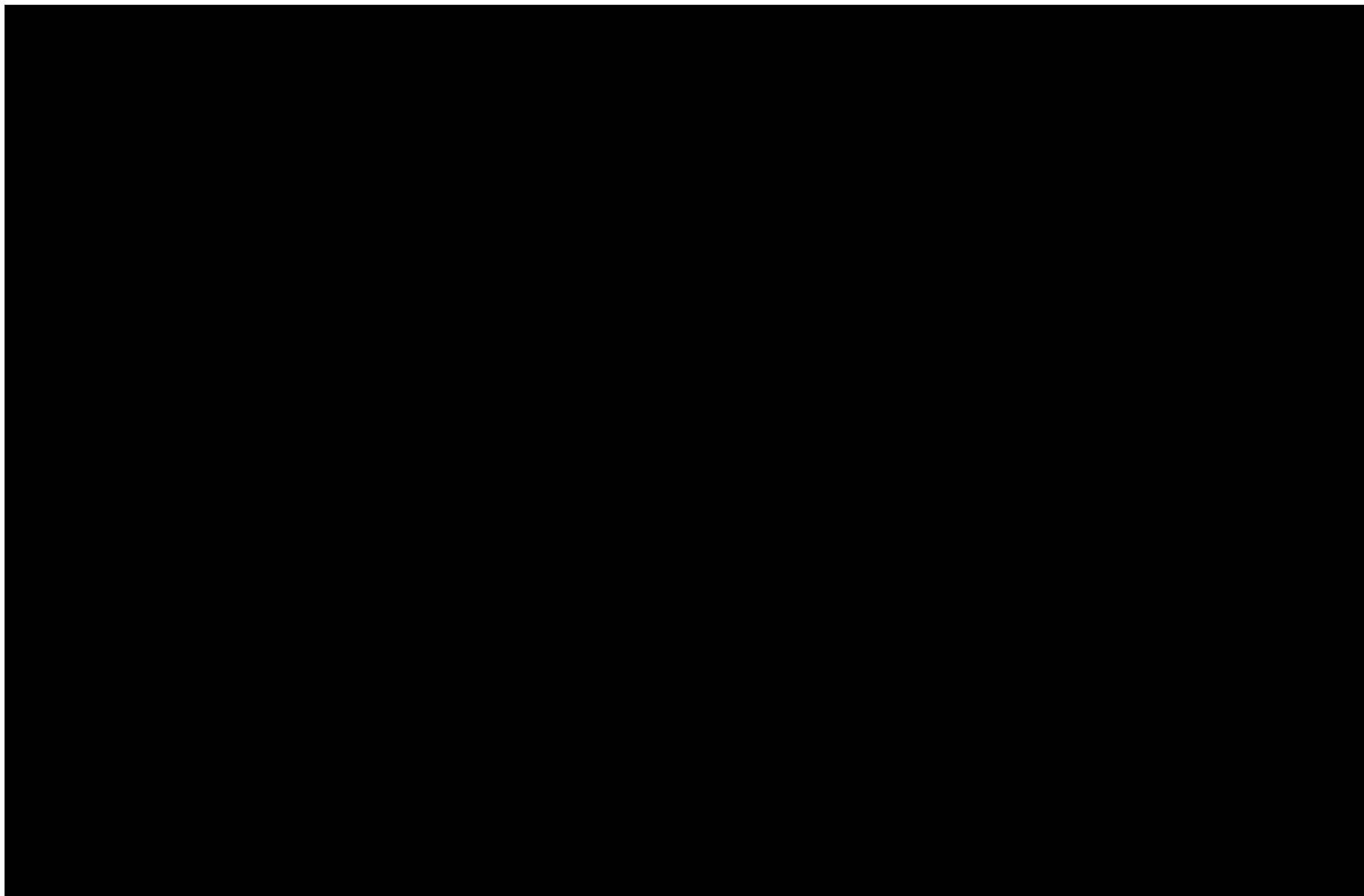
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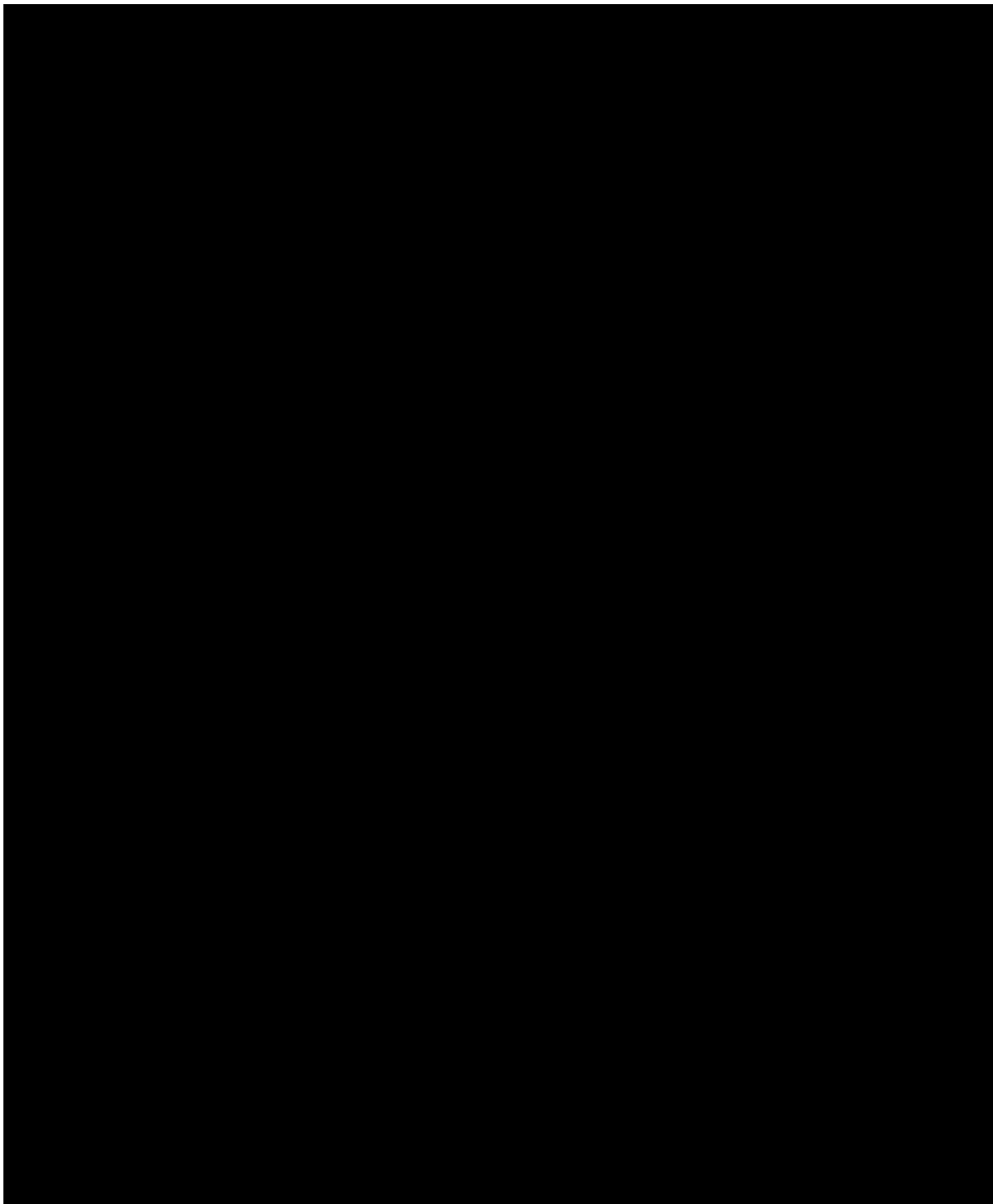


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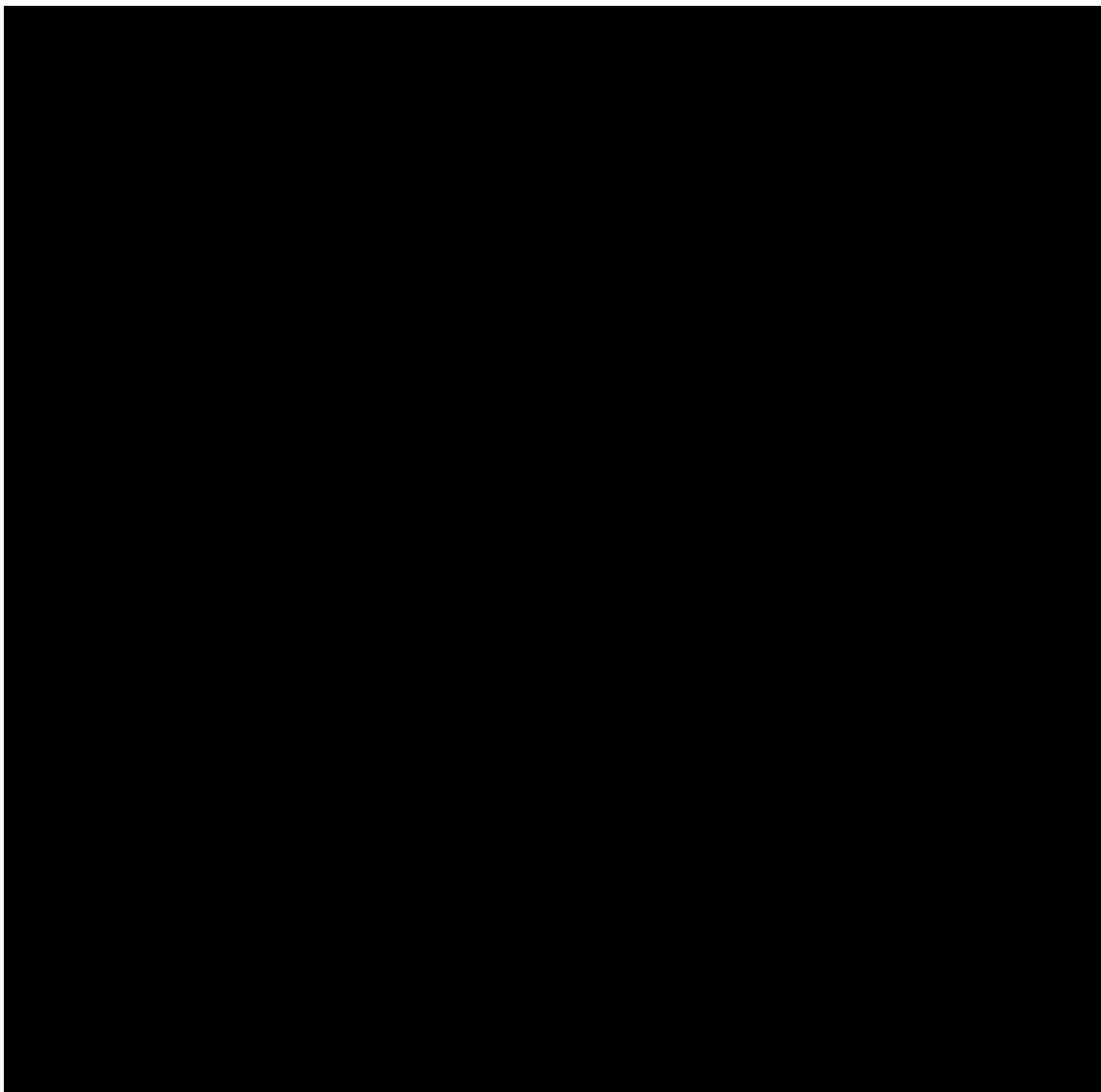


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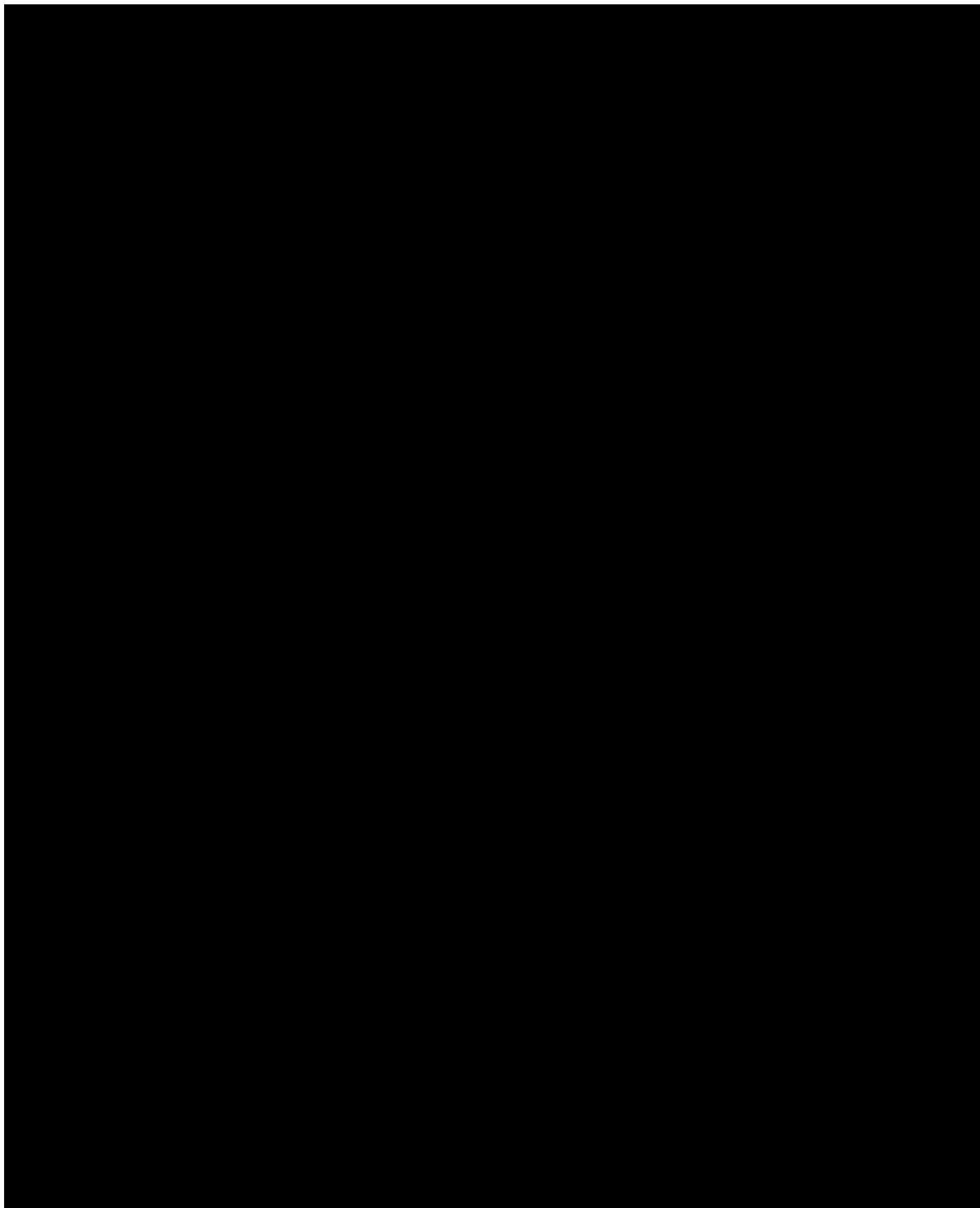
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 1	Page 2 of 7
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Date Approved: 02/26/2018		Effective Date: 02/26/2018	
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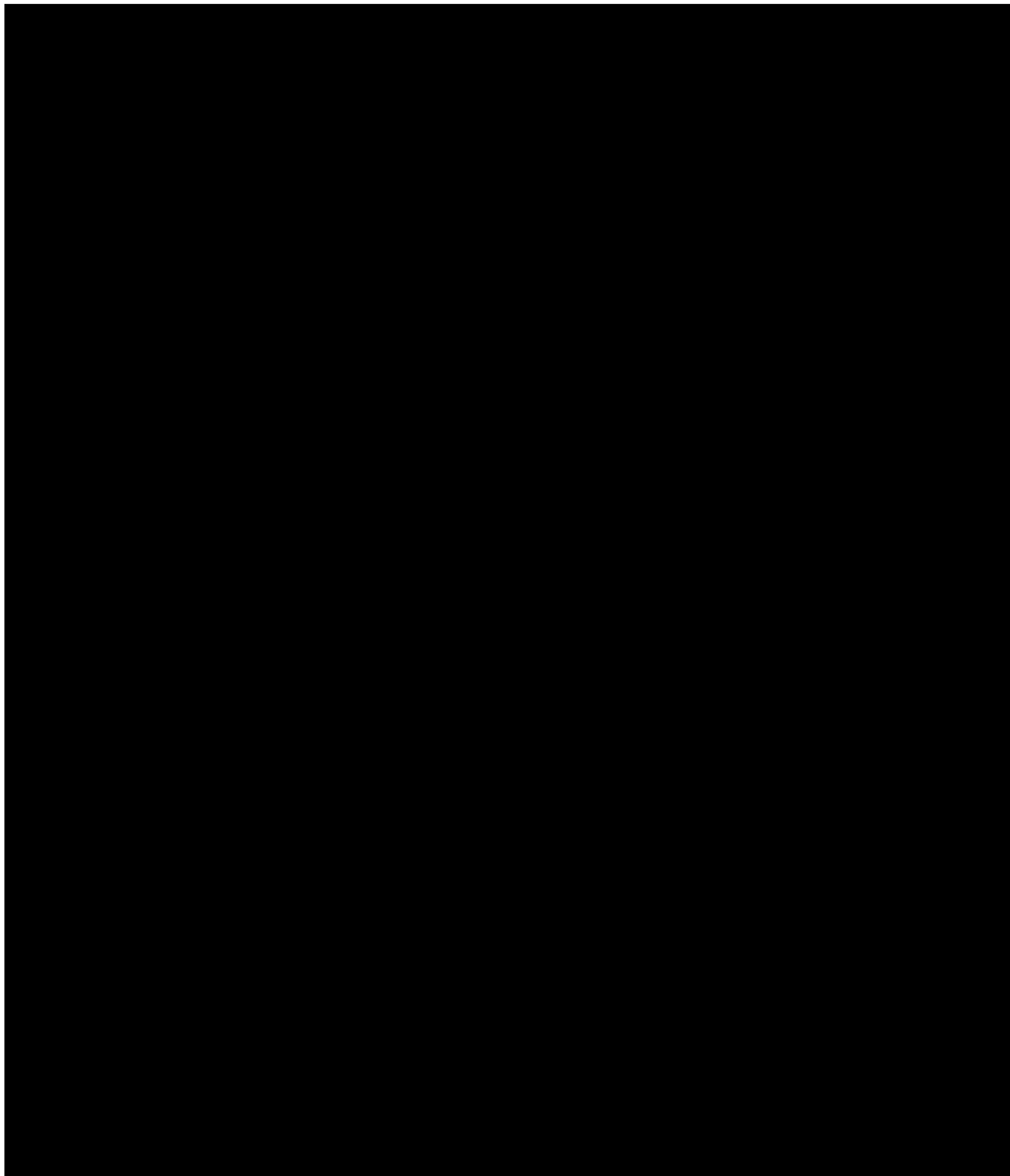
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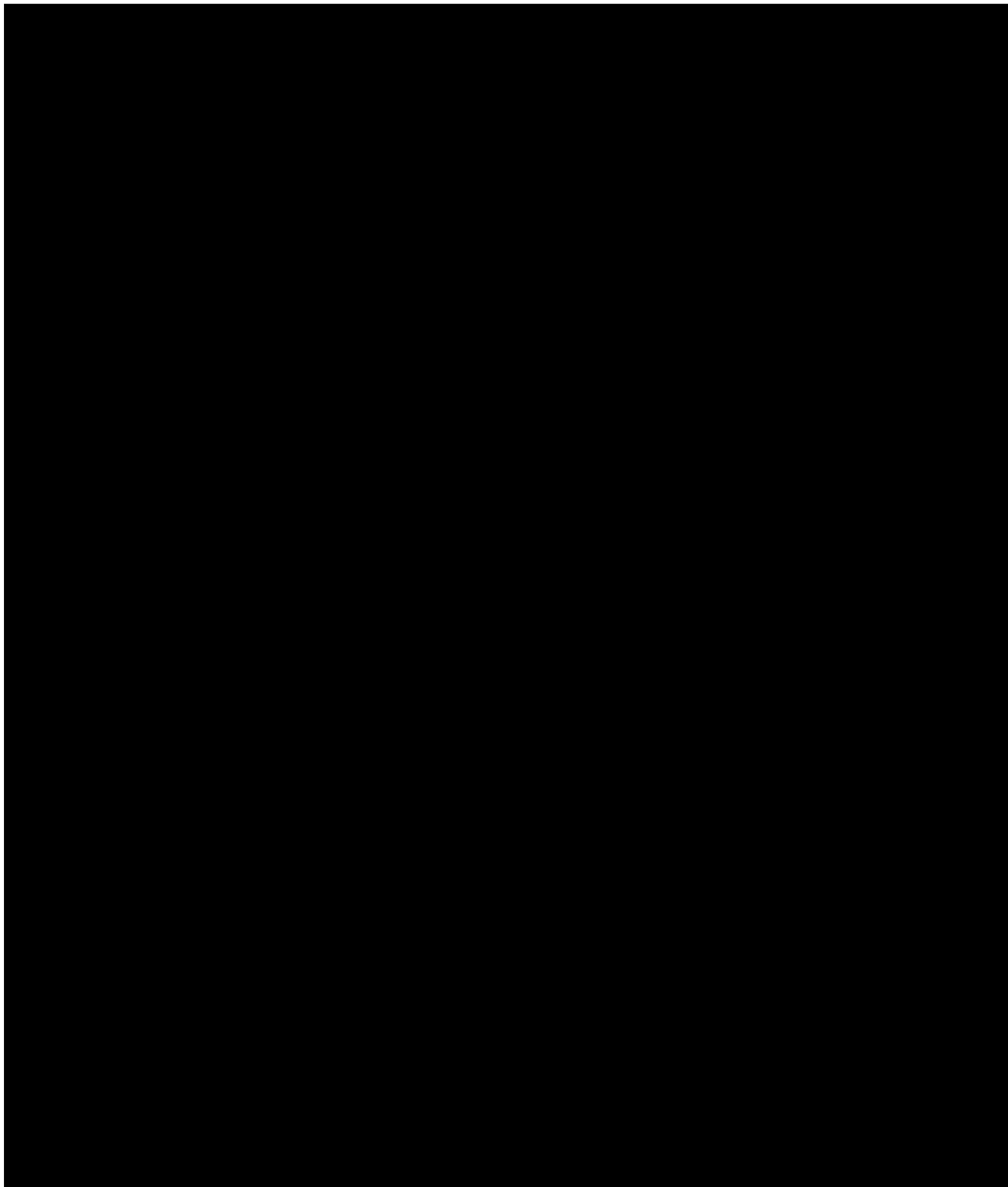
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 1	Page 3 of 7
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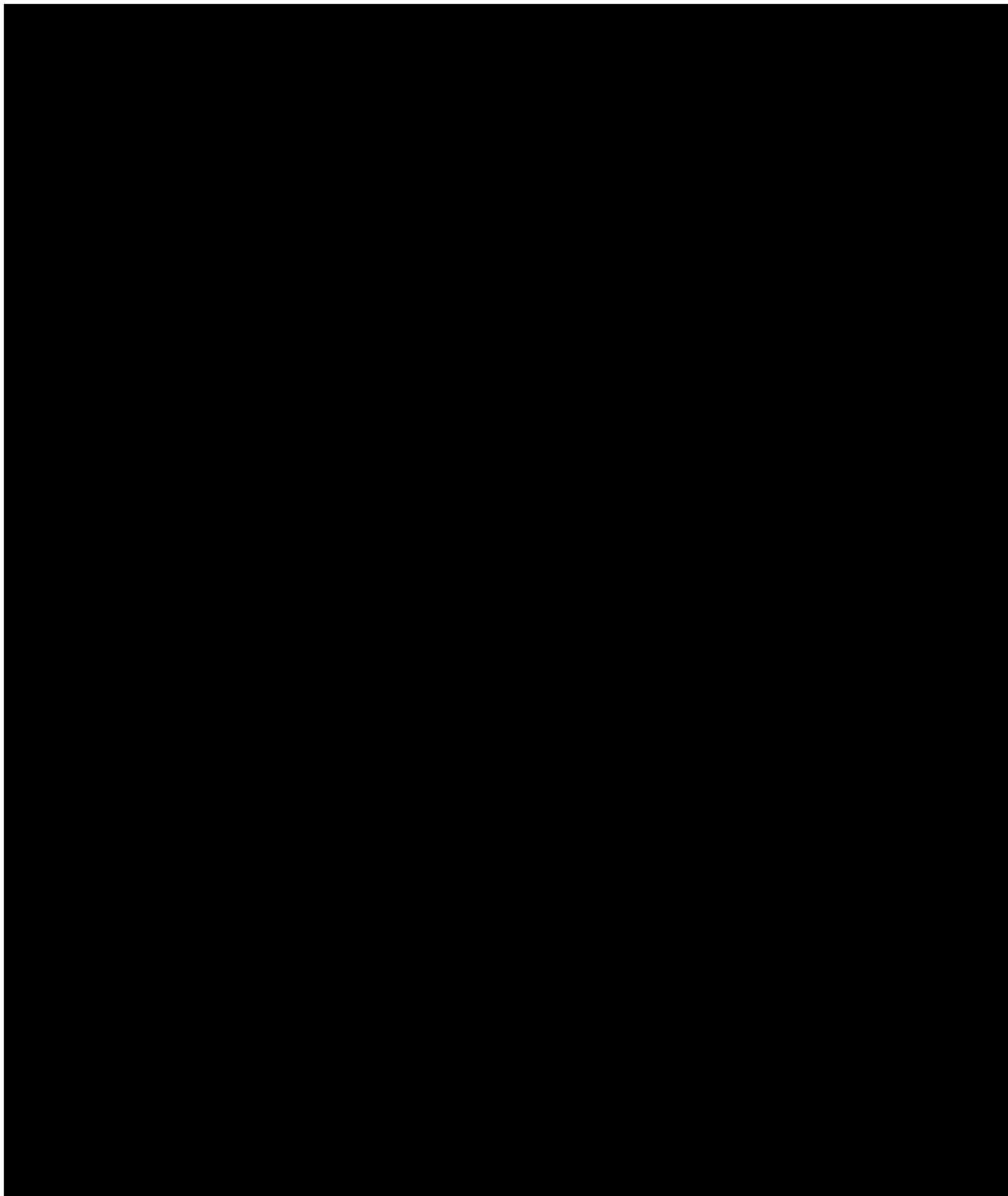
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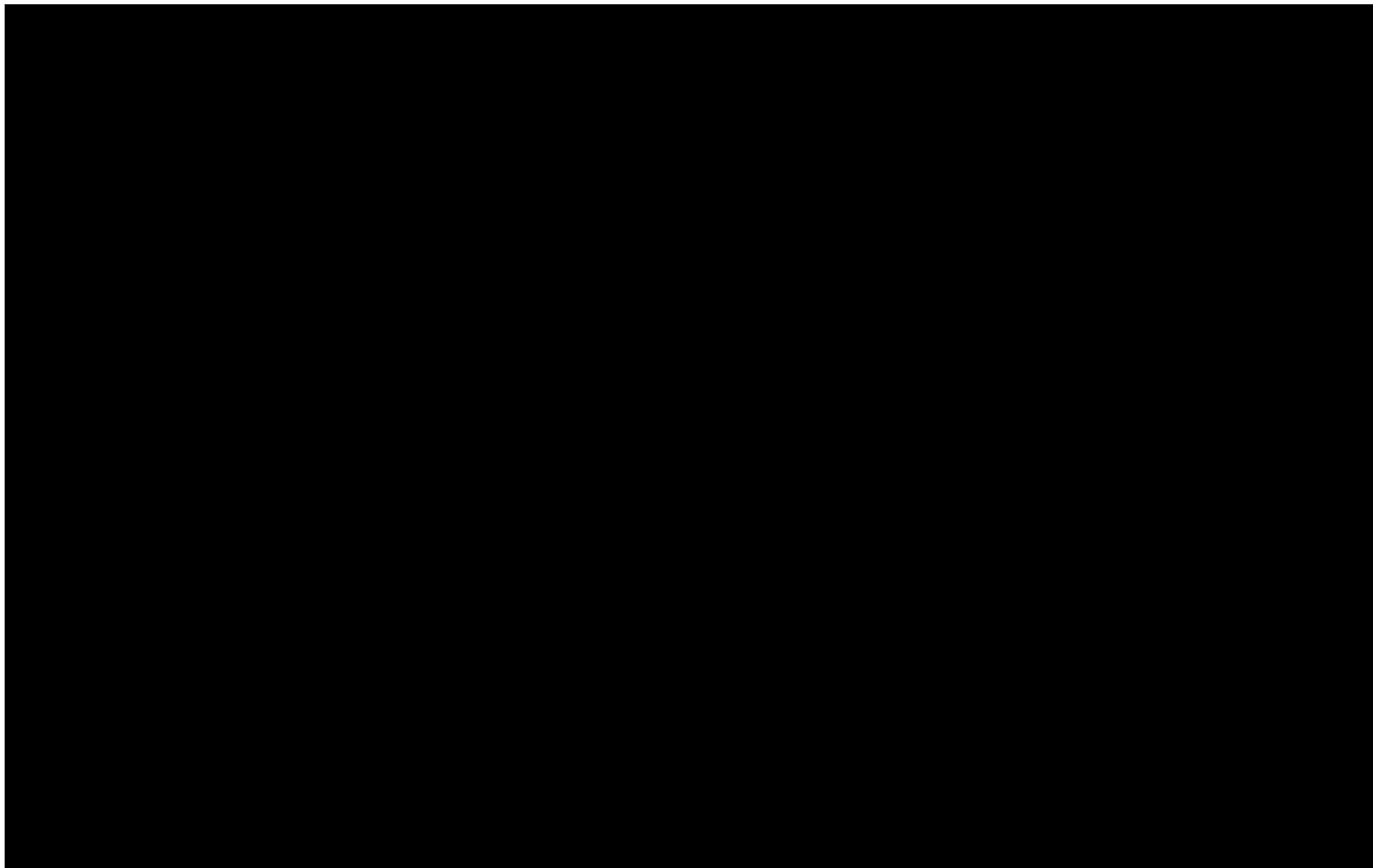
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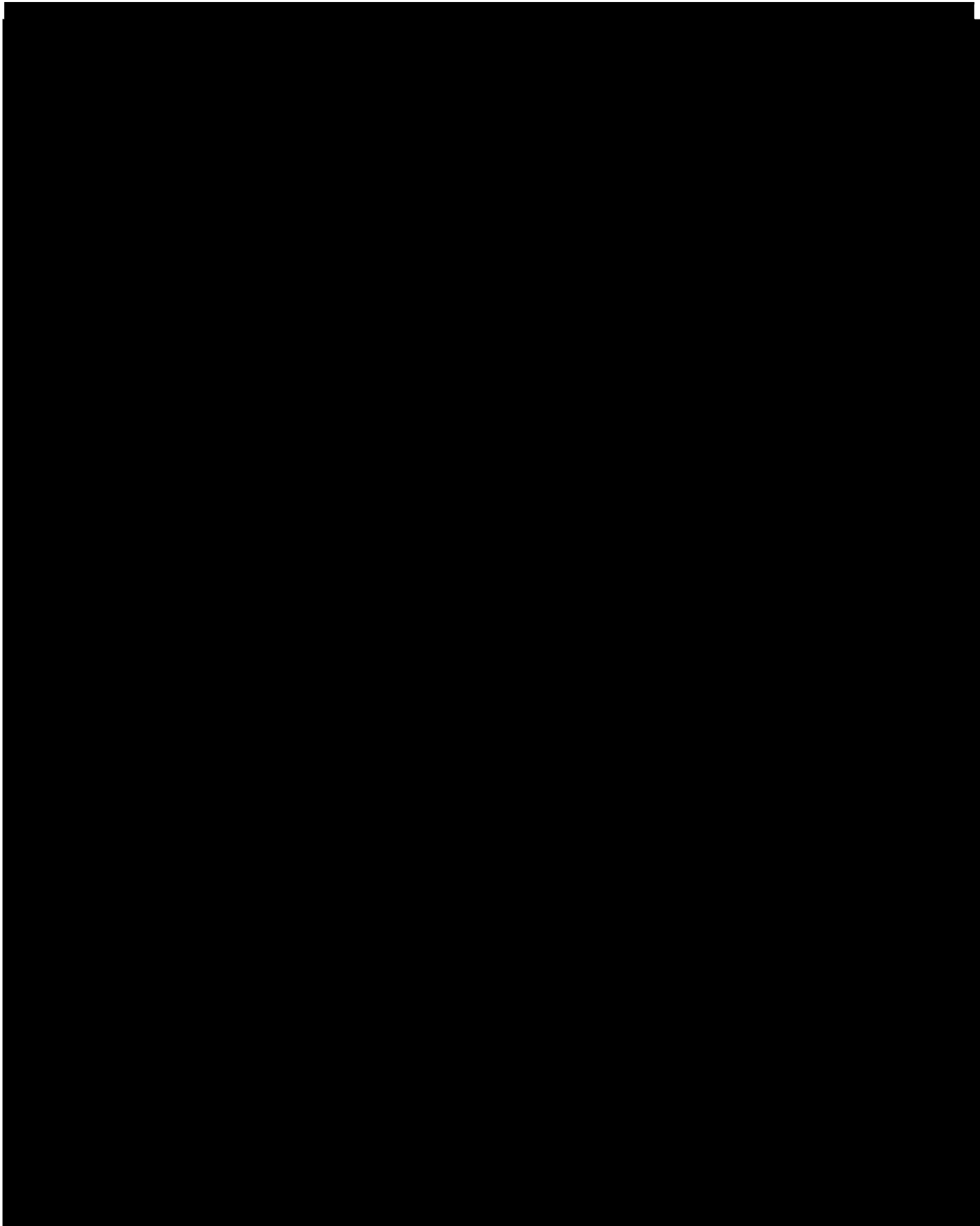
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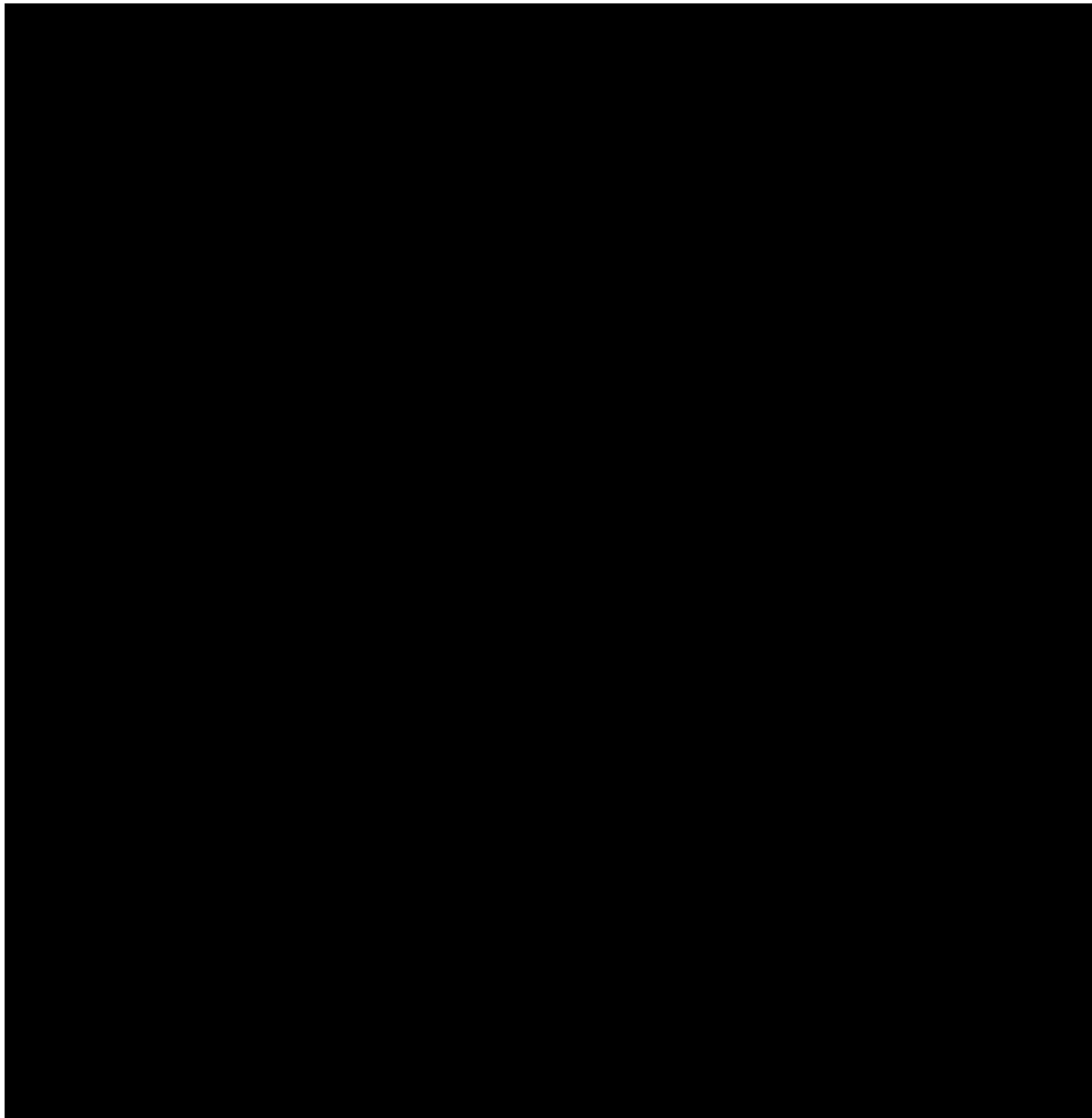
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Approved By: Jack Skufca		Galveston Bay Refinery	
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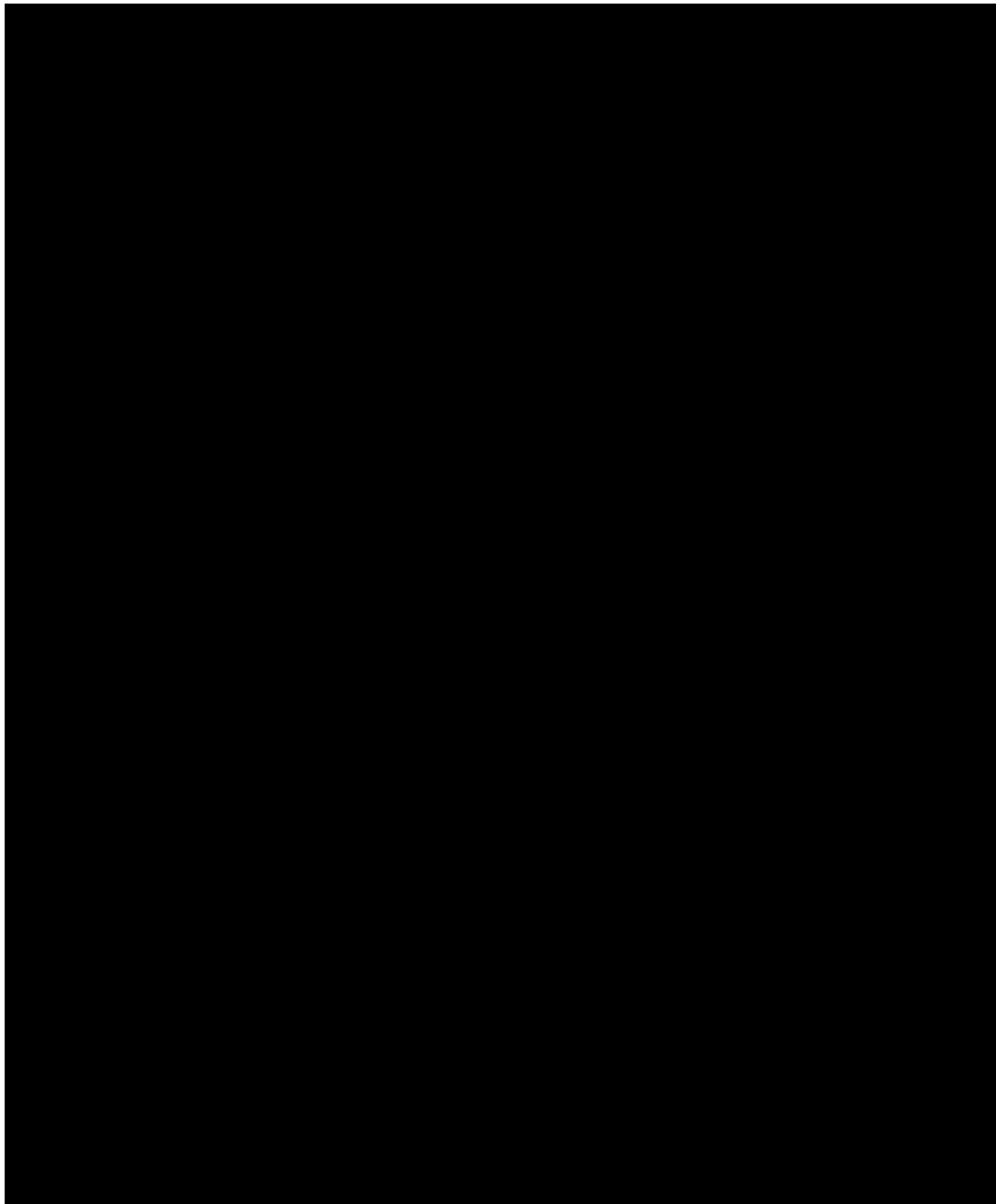
- 1.1 This Procedure provides detailed instructions to prepare PWR4 equipment for potential freezing or near freezing weather conditions.



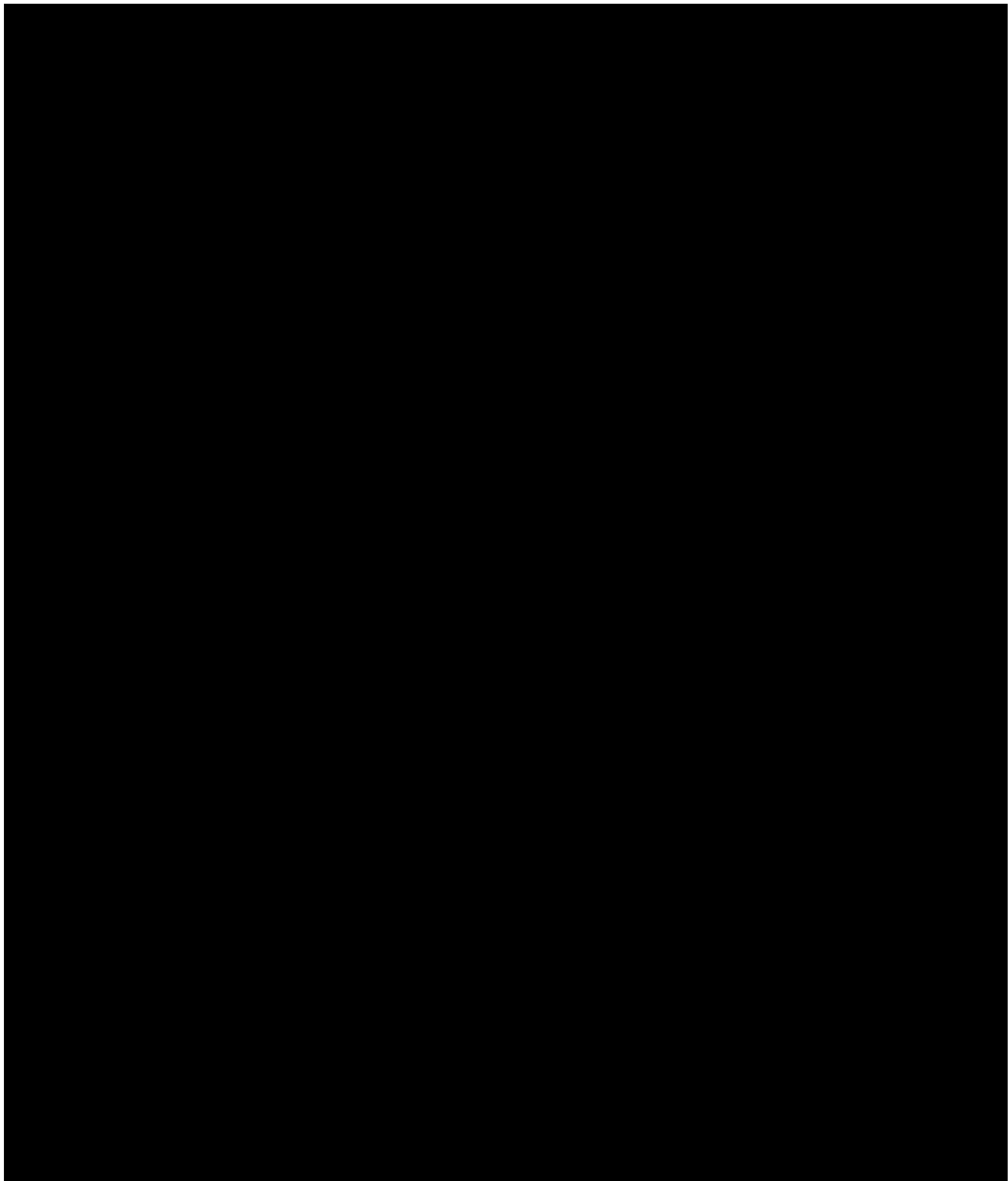
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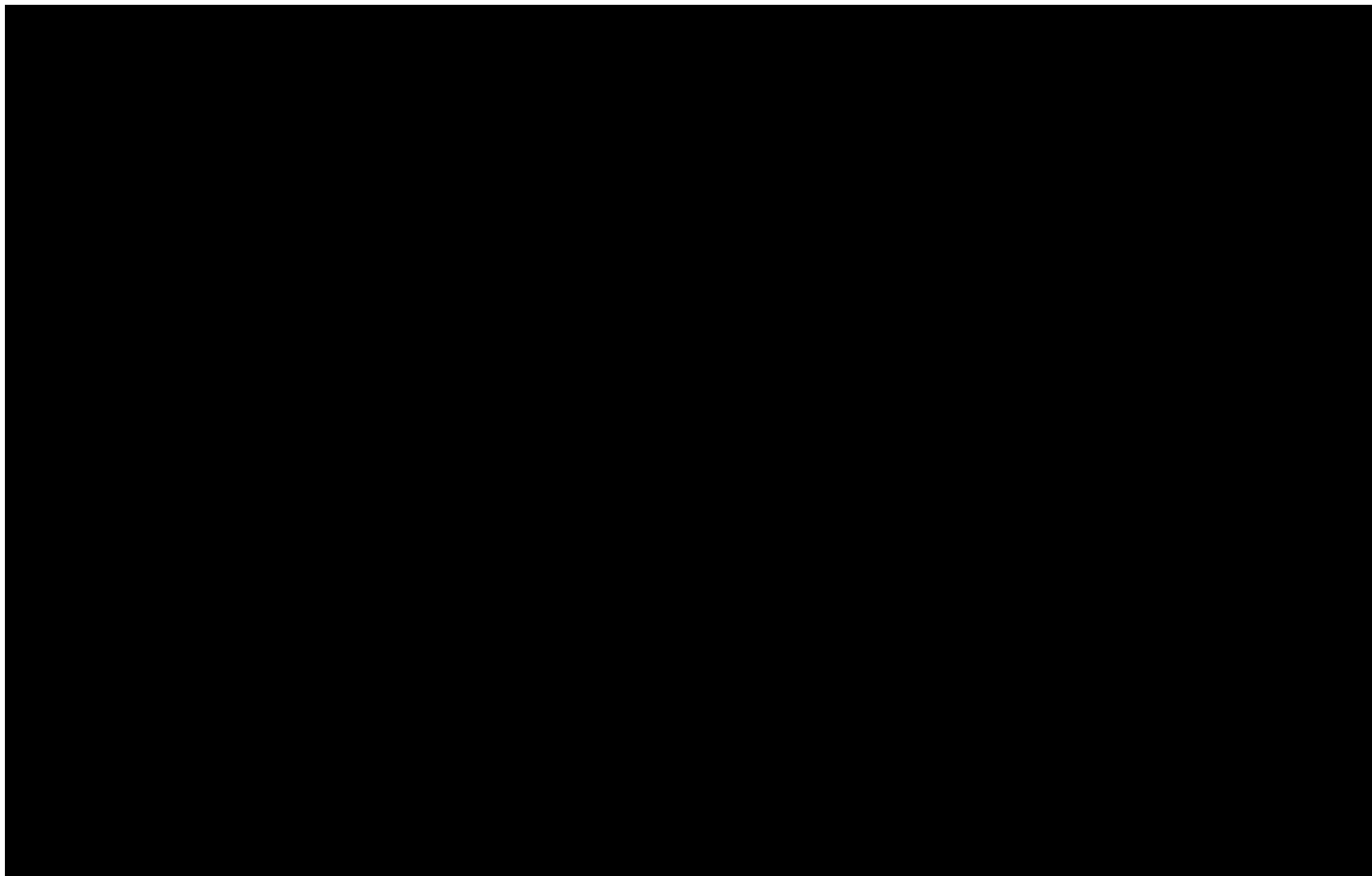
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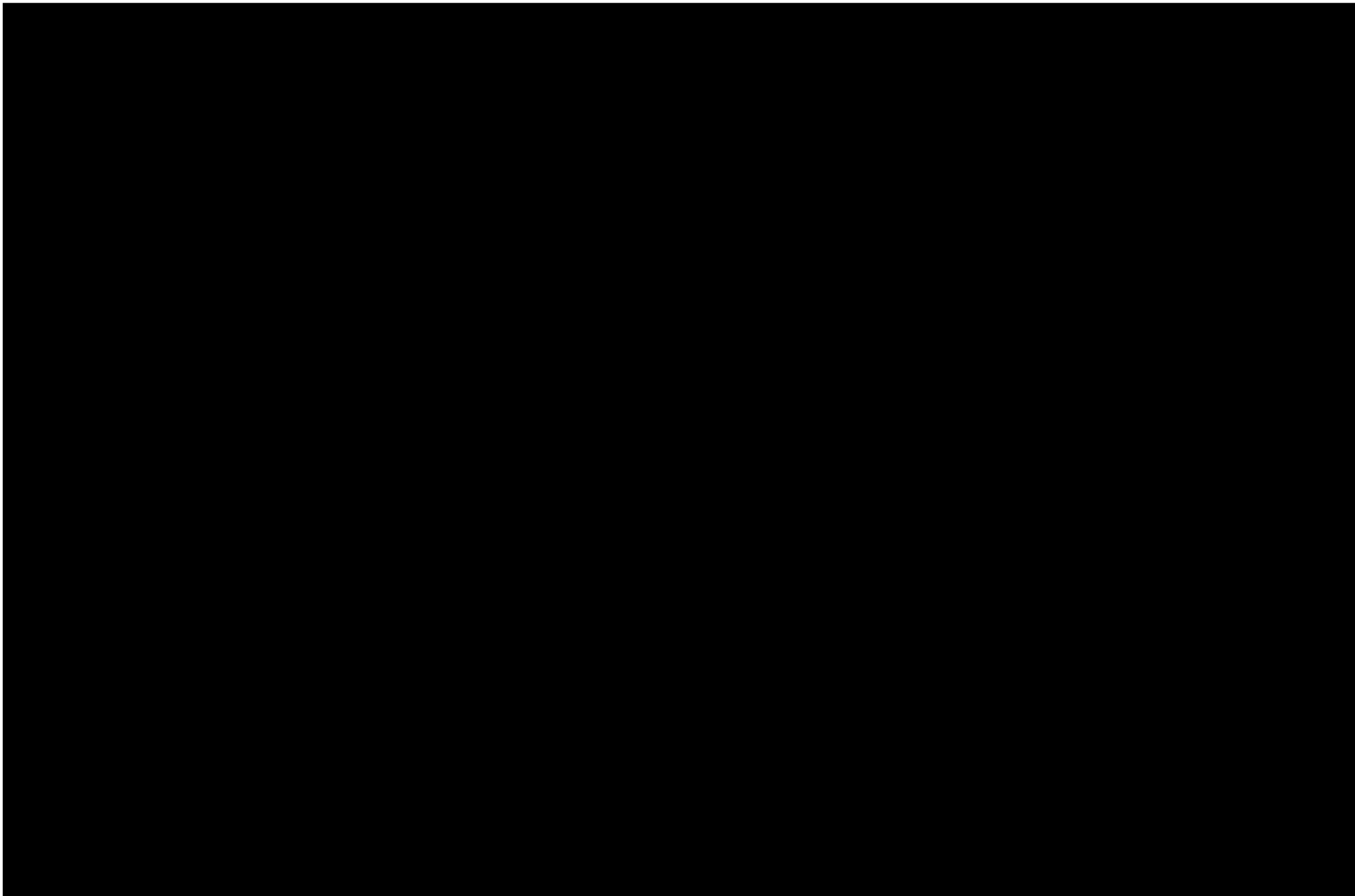
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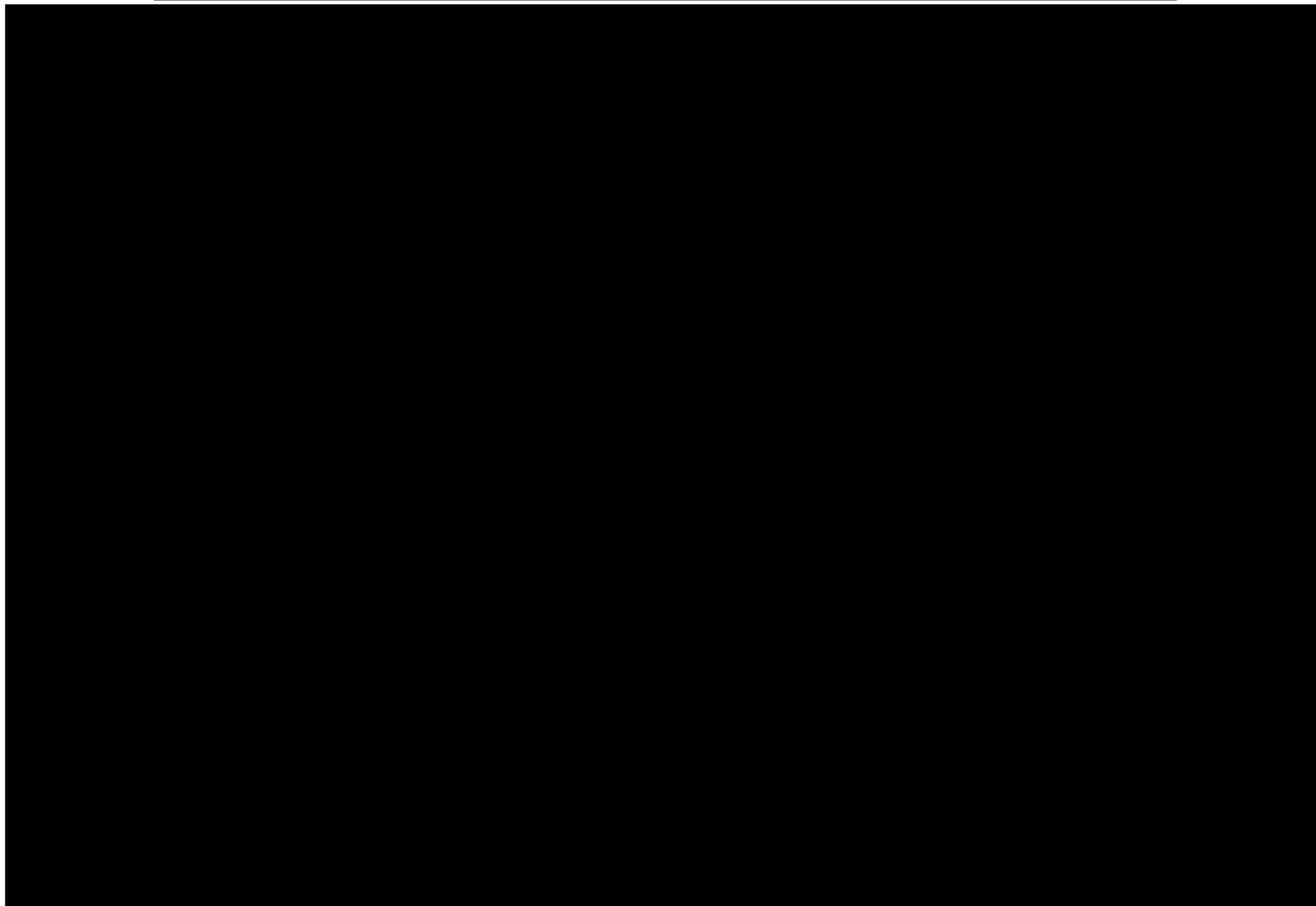
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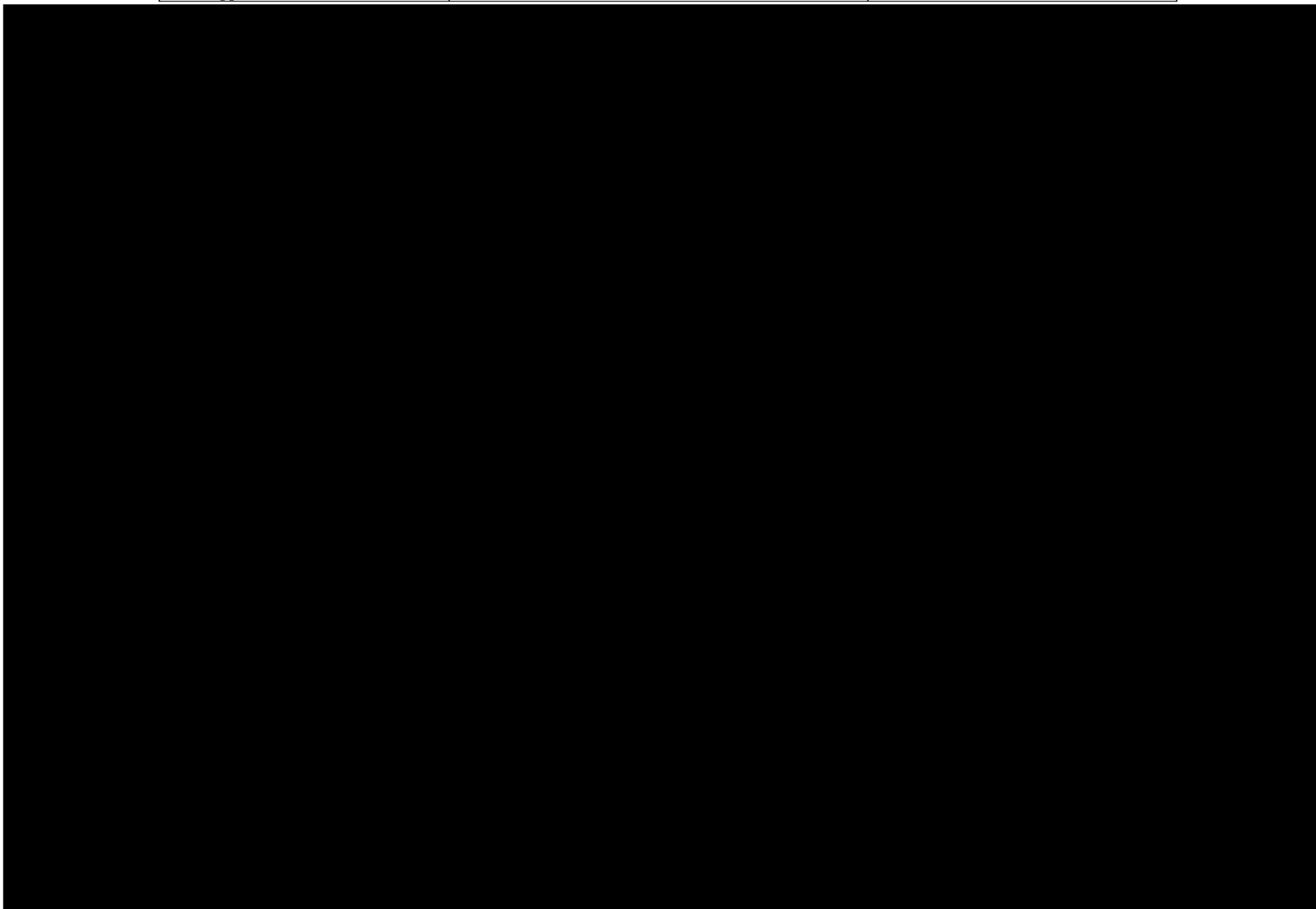
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 2	Page 7 of 10
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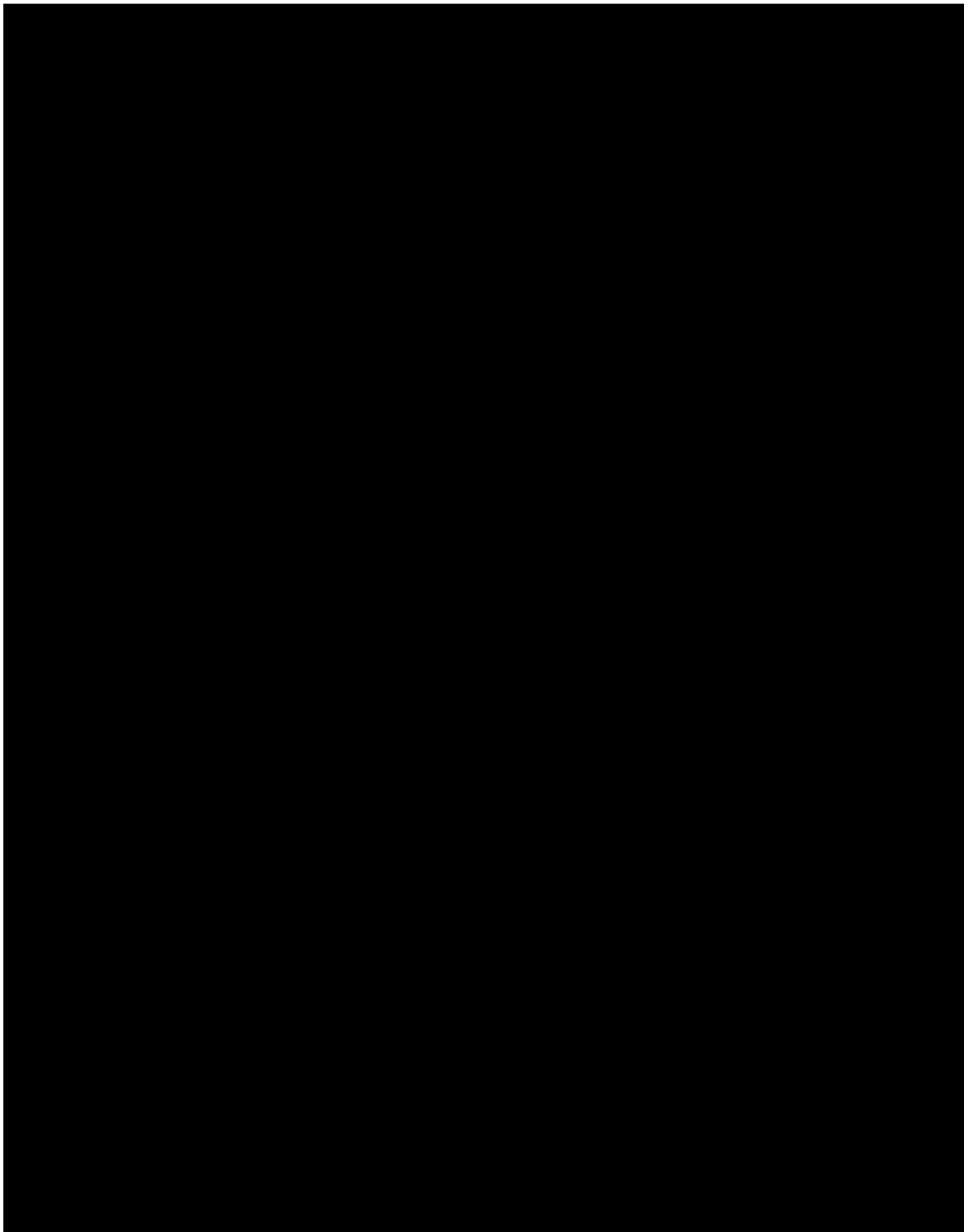
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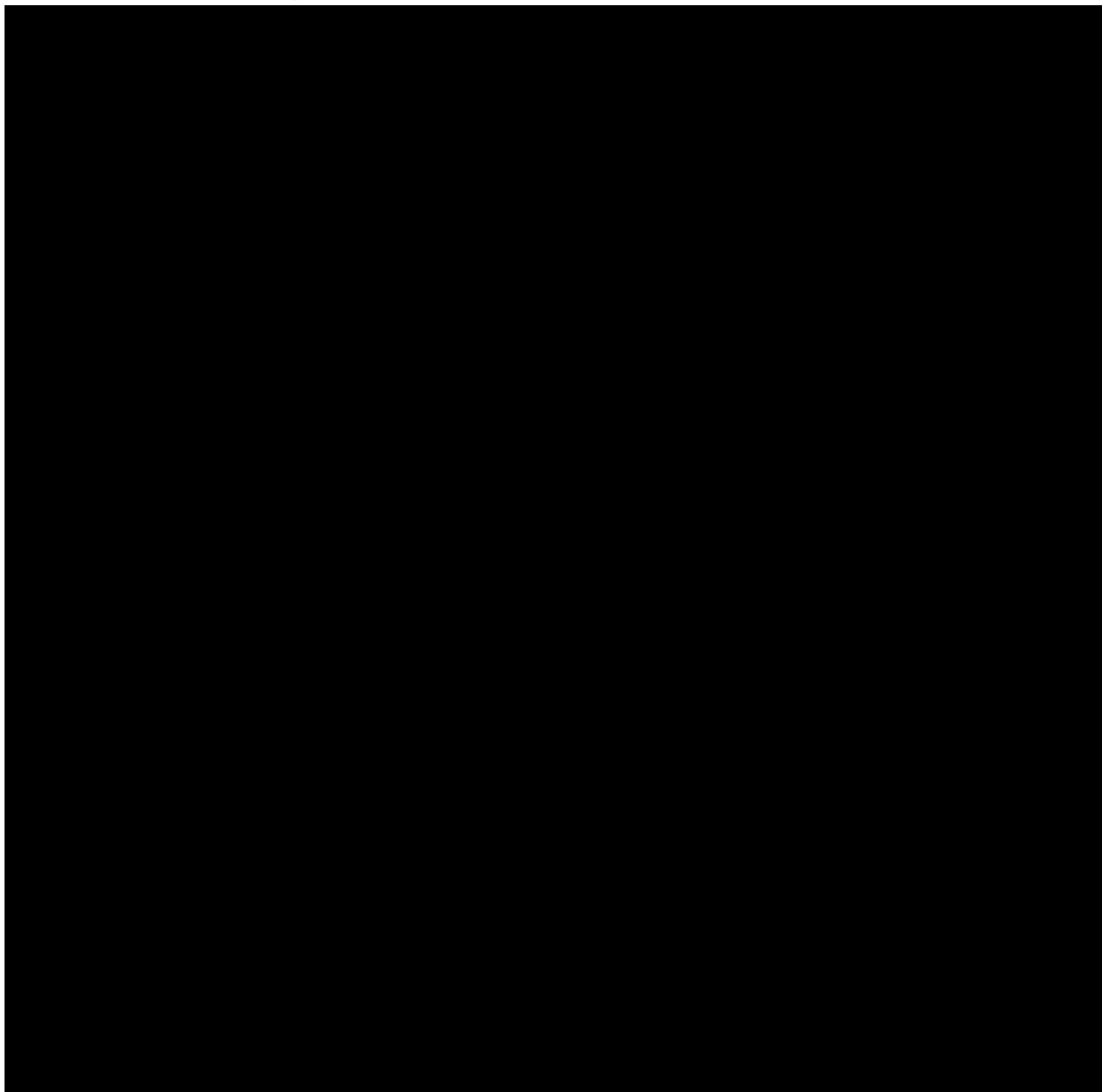


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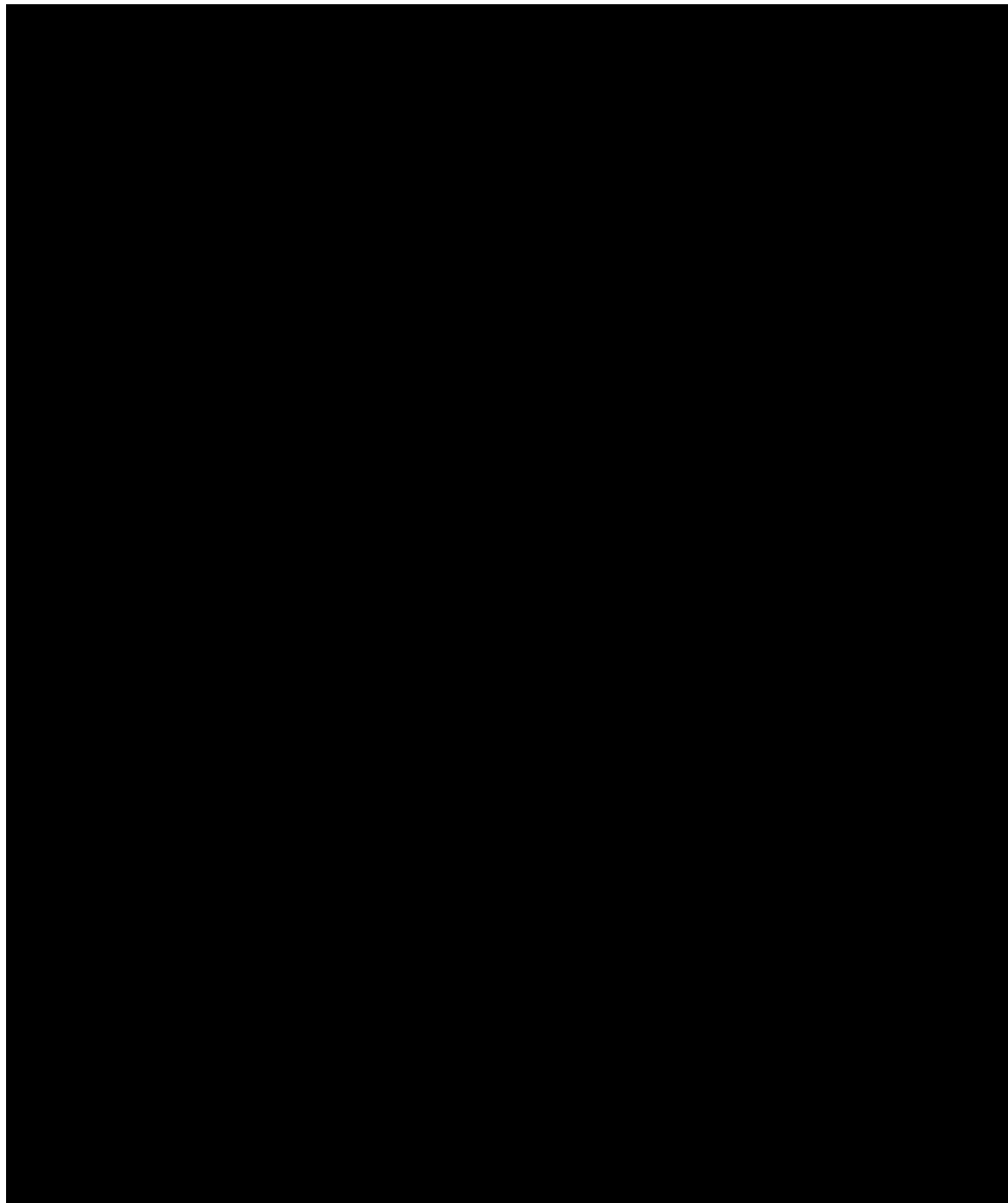
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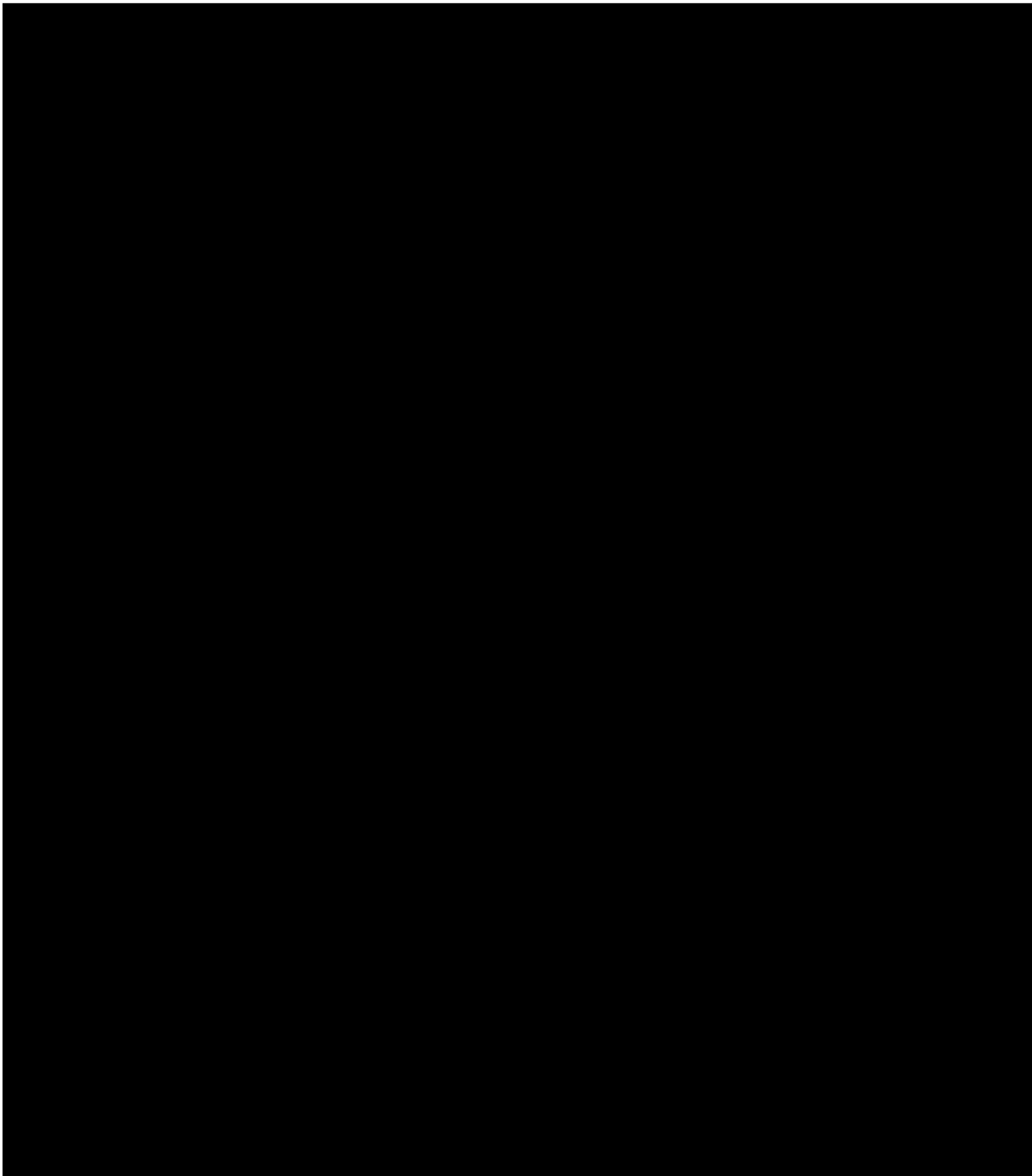
- 1.1 This Procedure provides detailed instructions to energize the PWR4 additional freeze protection equipment such as heat lamps and steam heat during freezing or near freezing weather conditions.



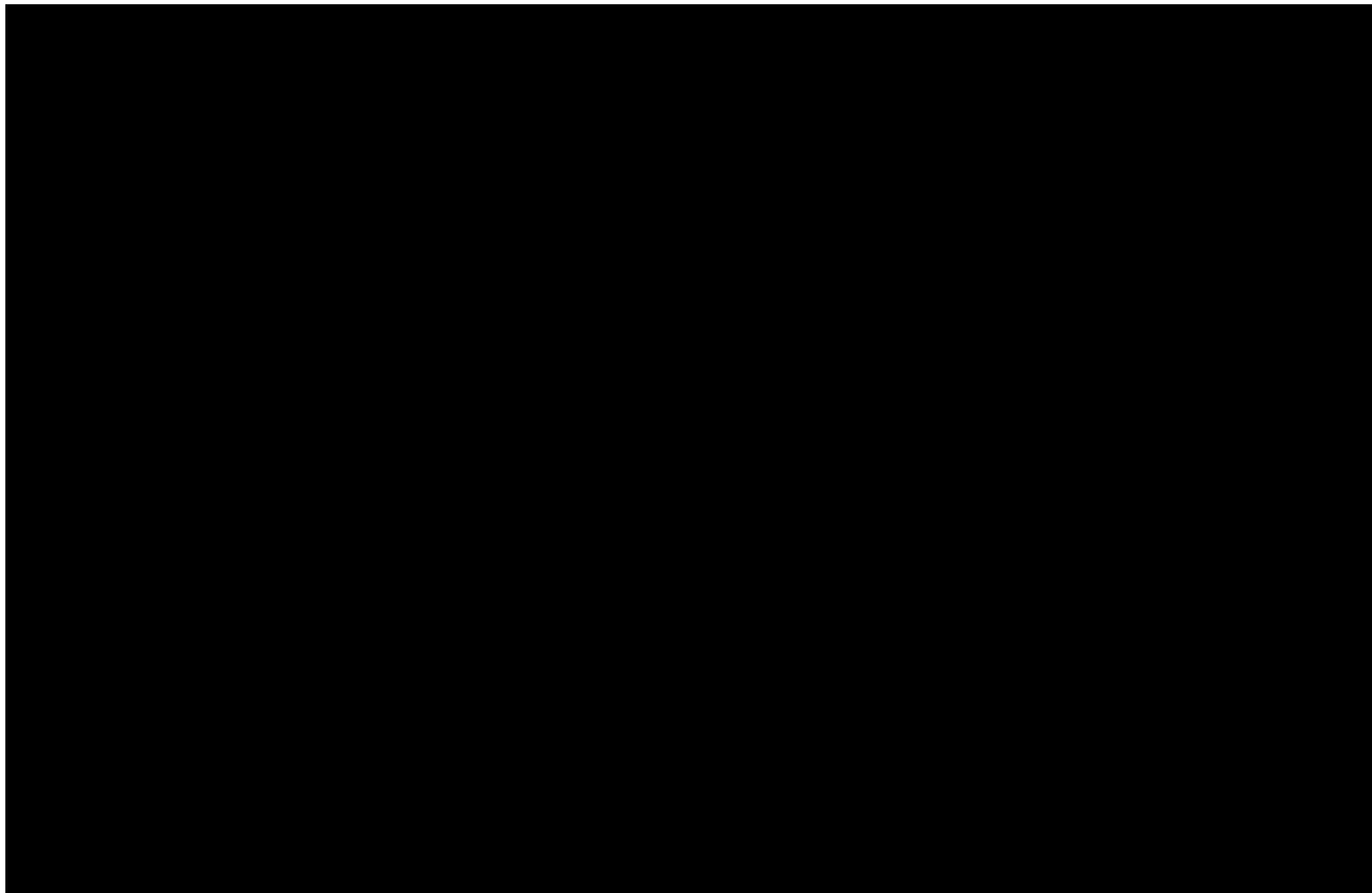
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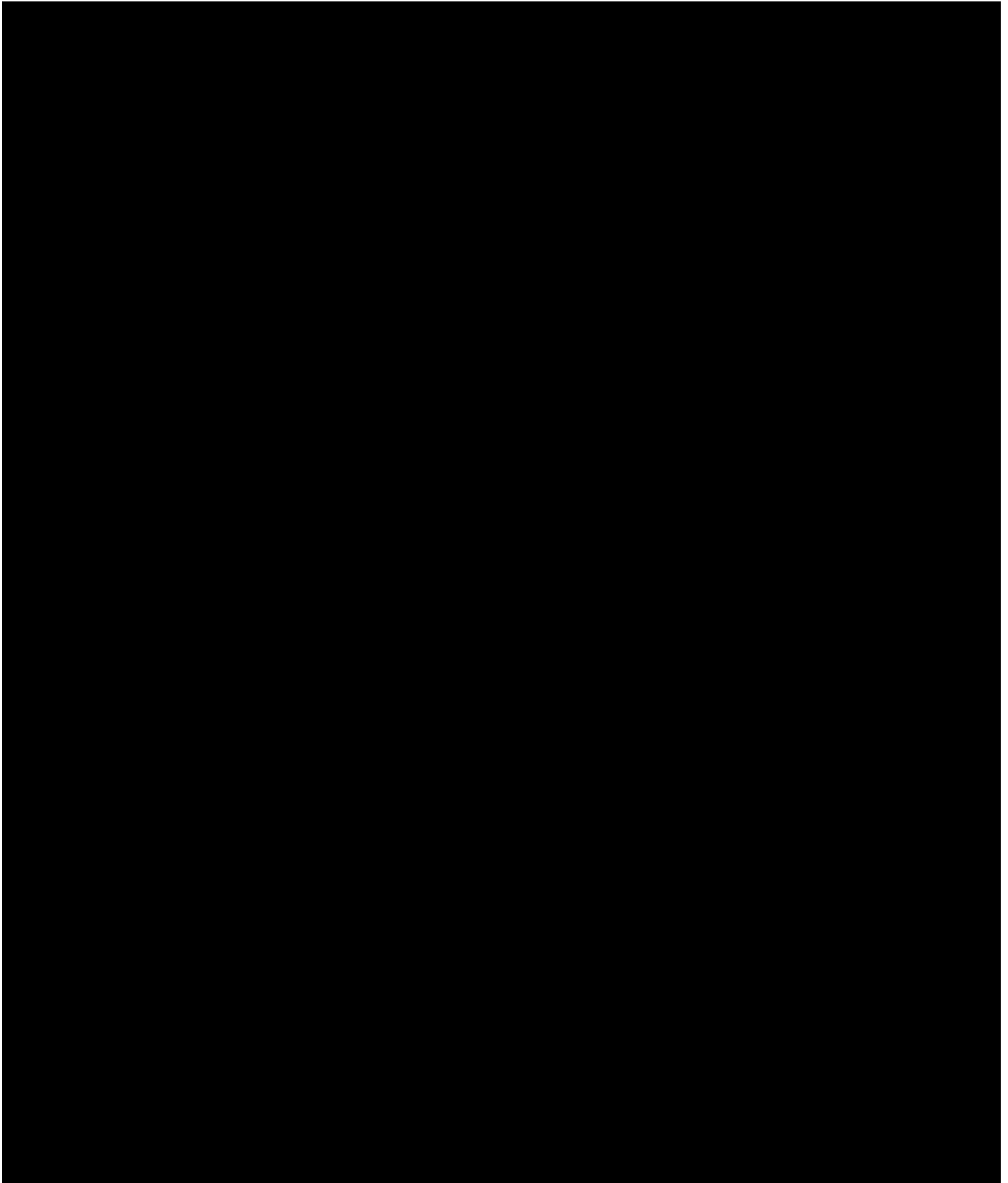
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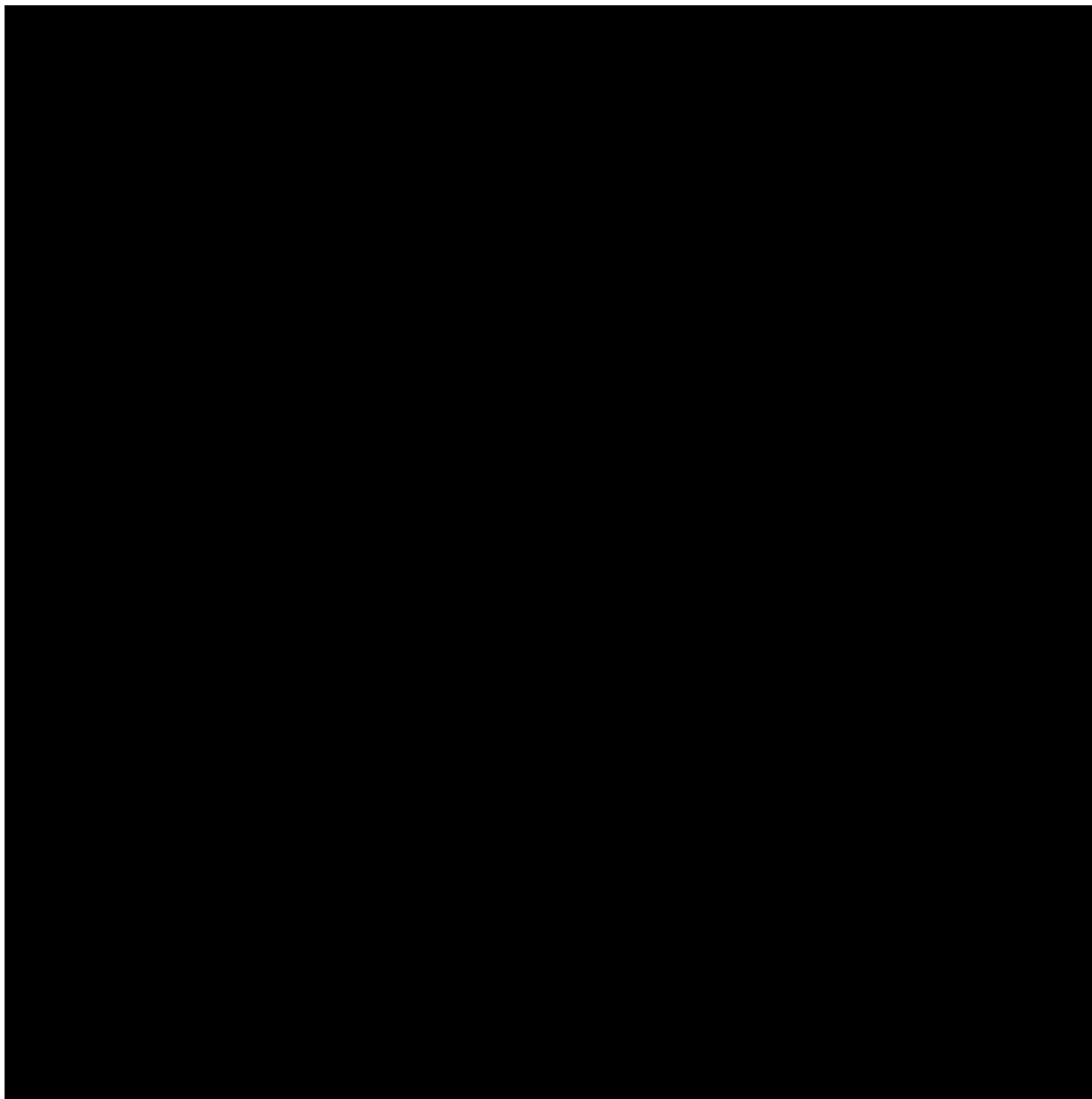
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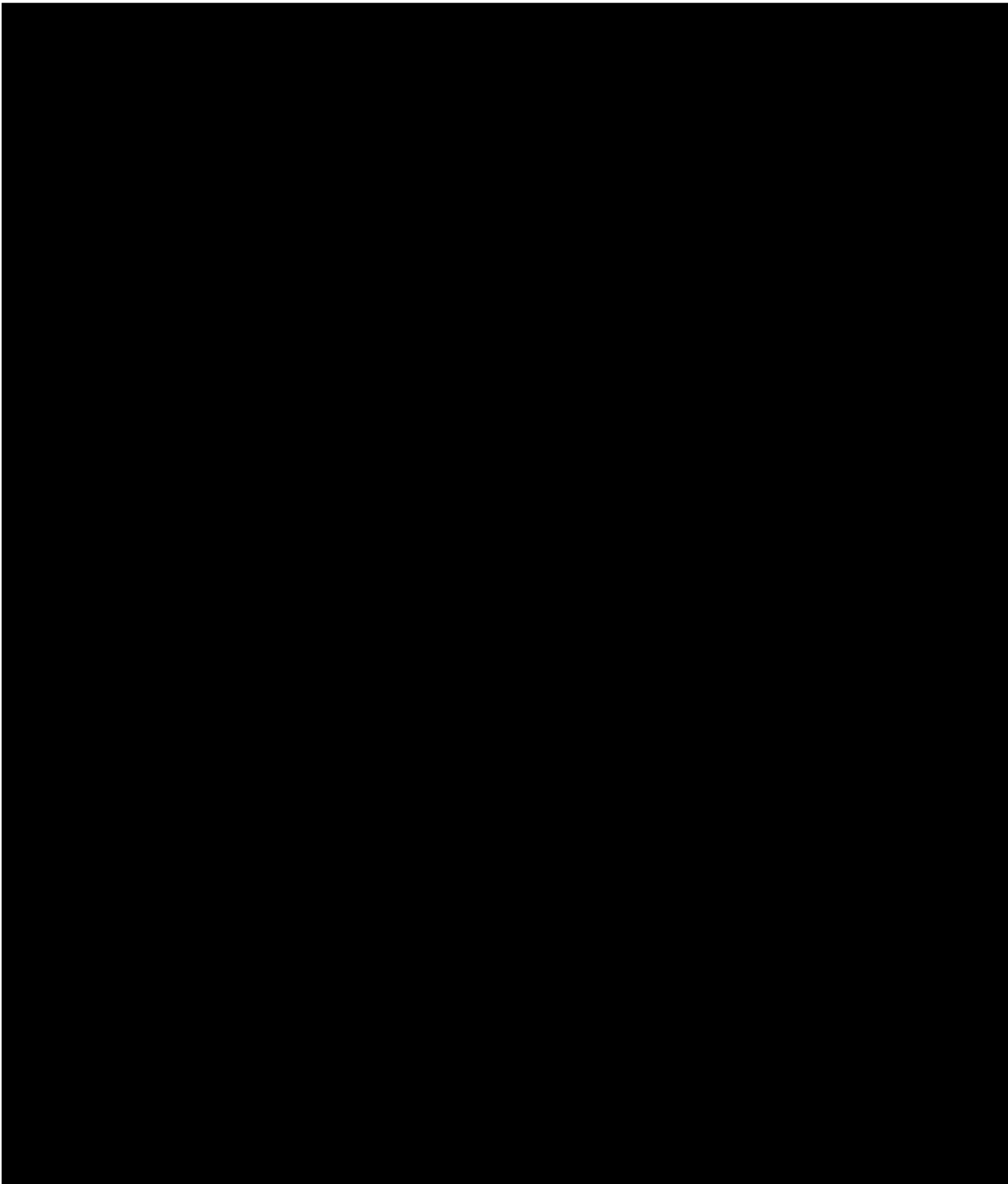
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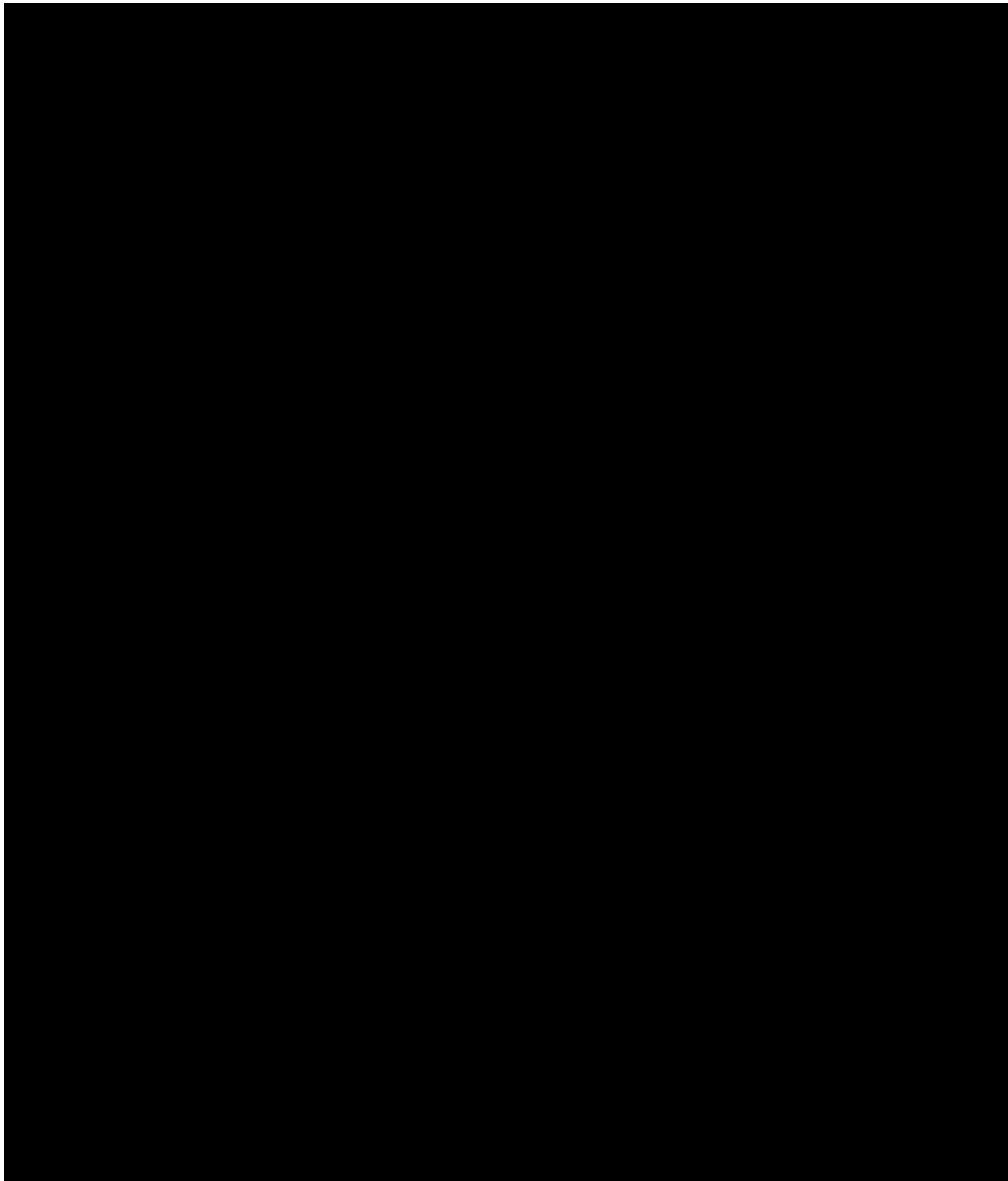
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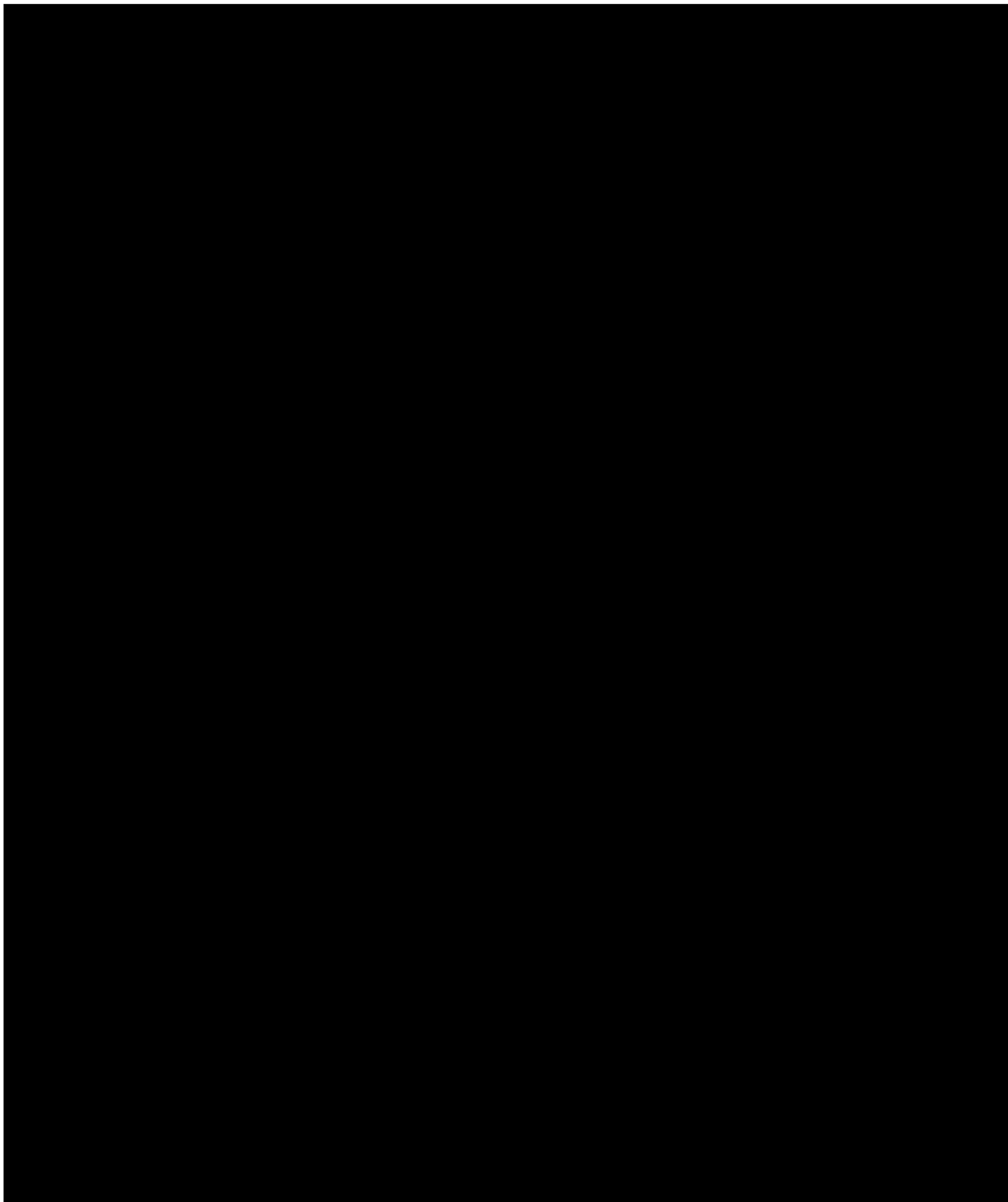
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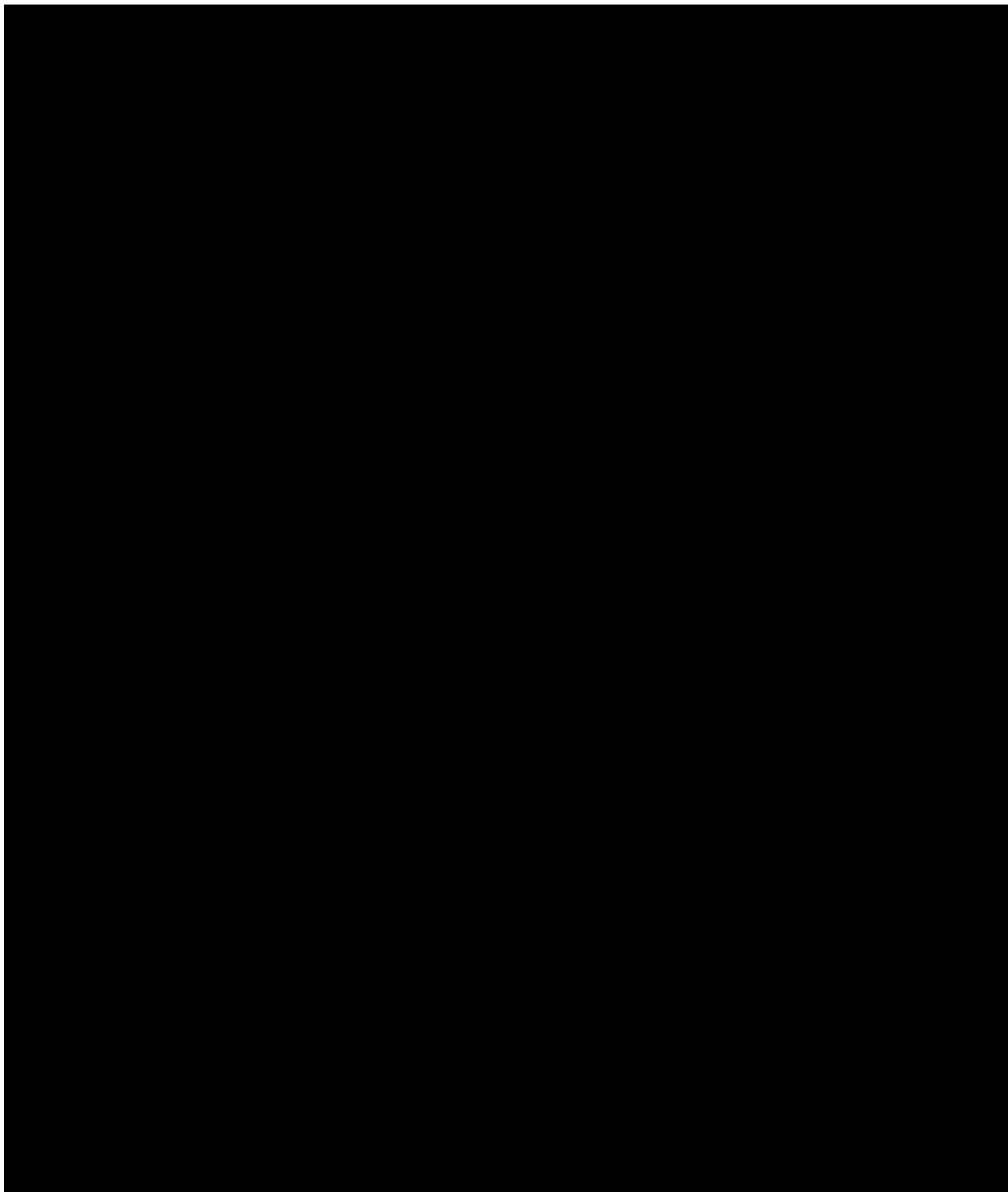
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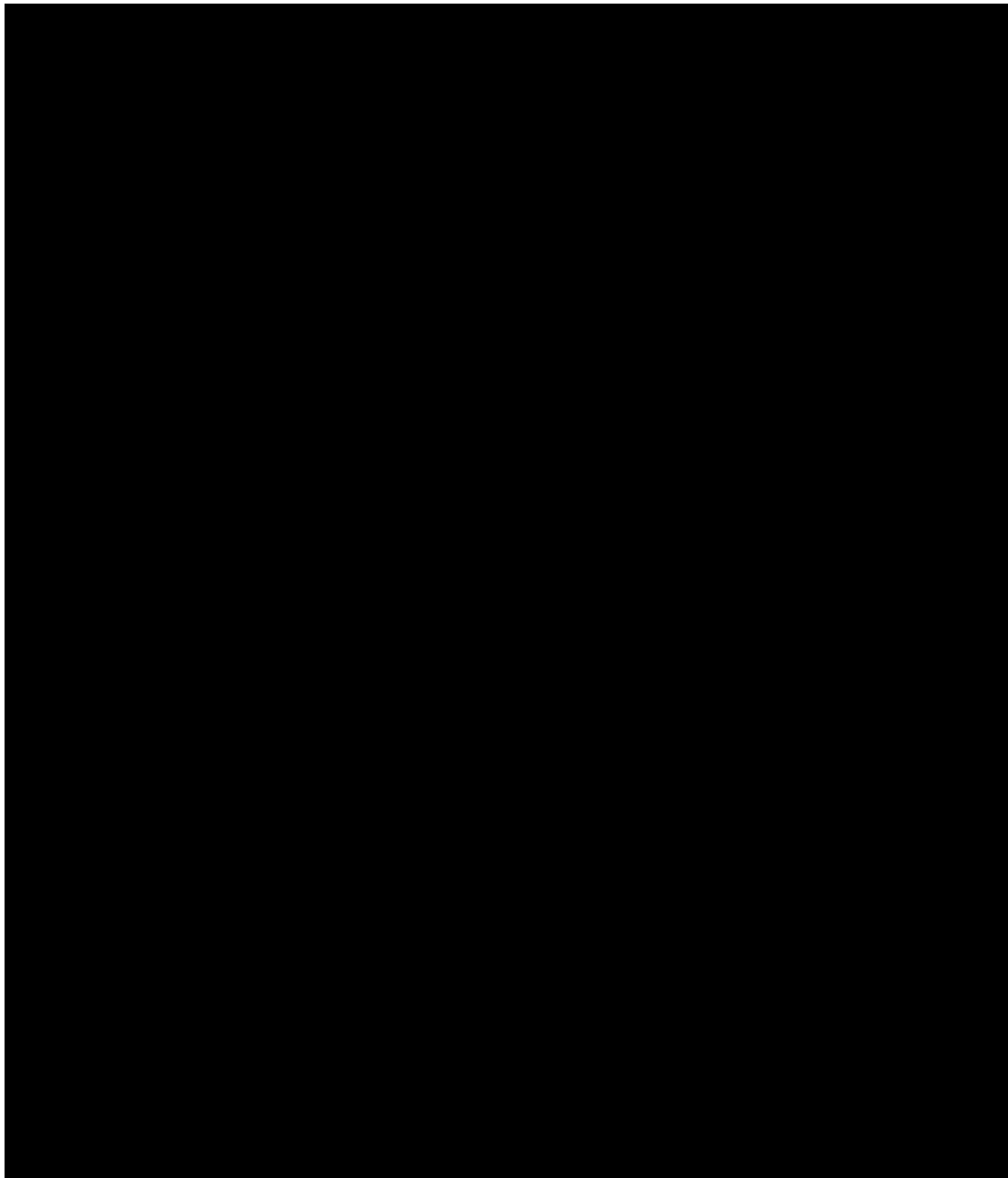
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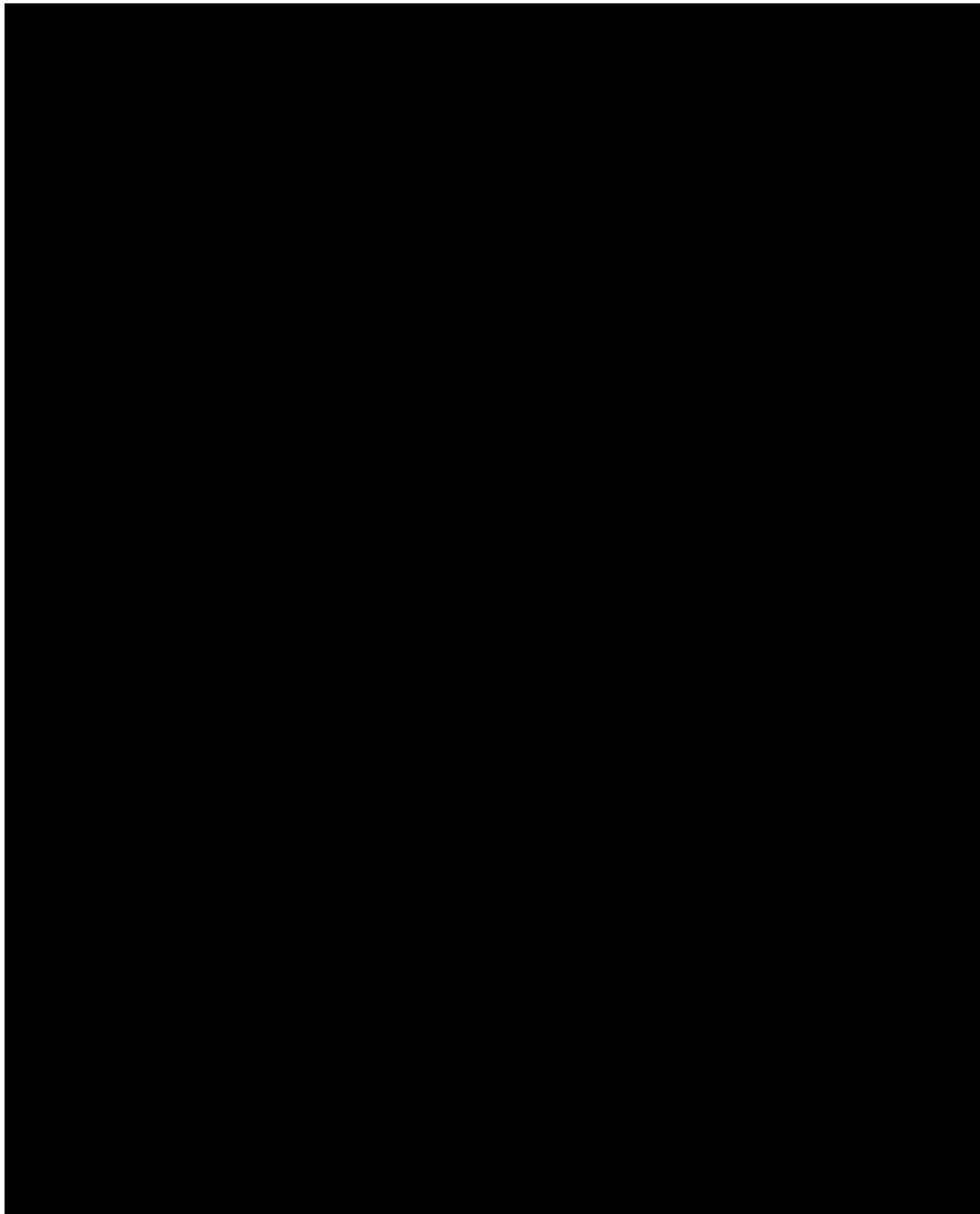
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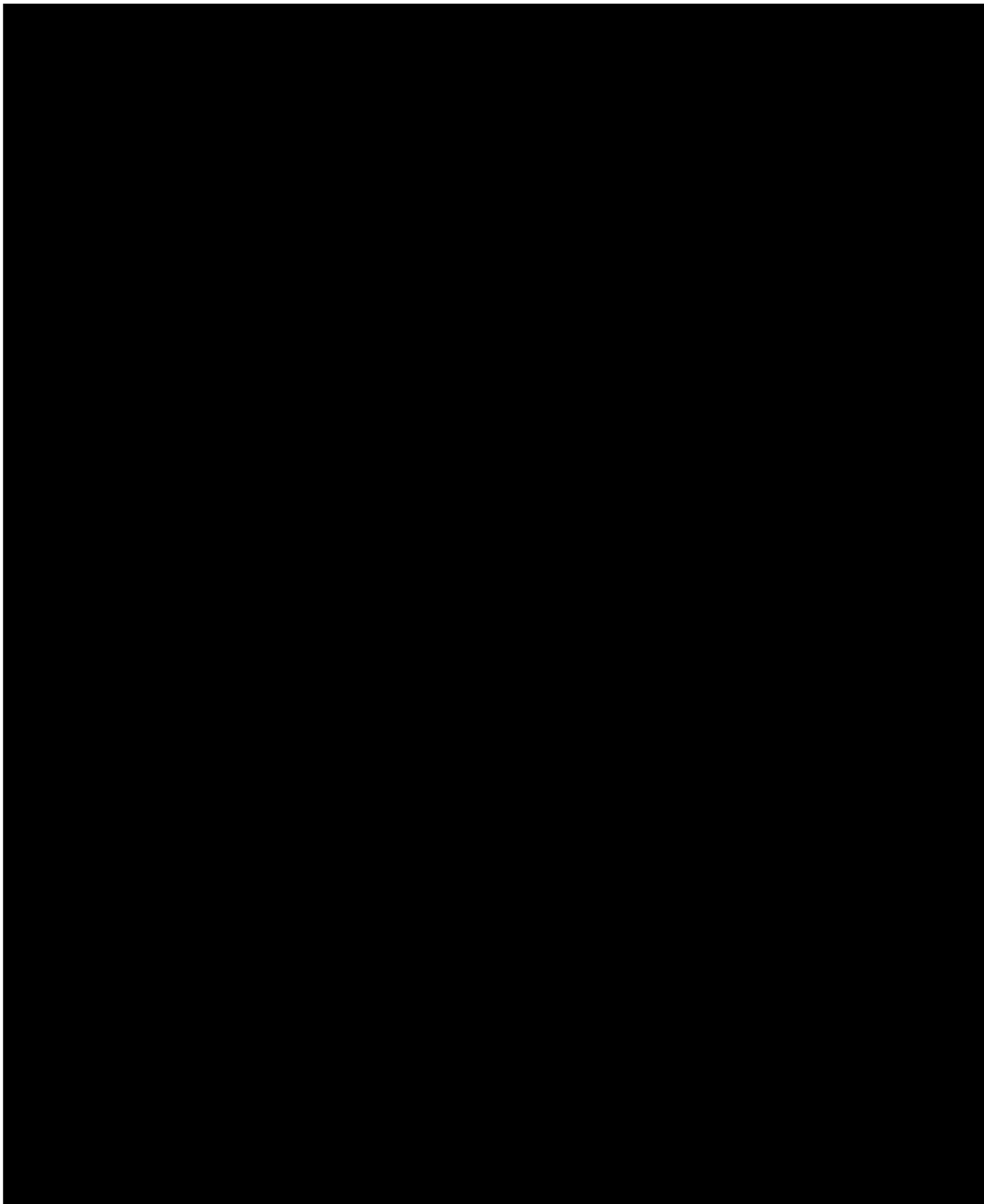
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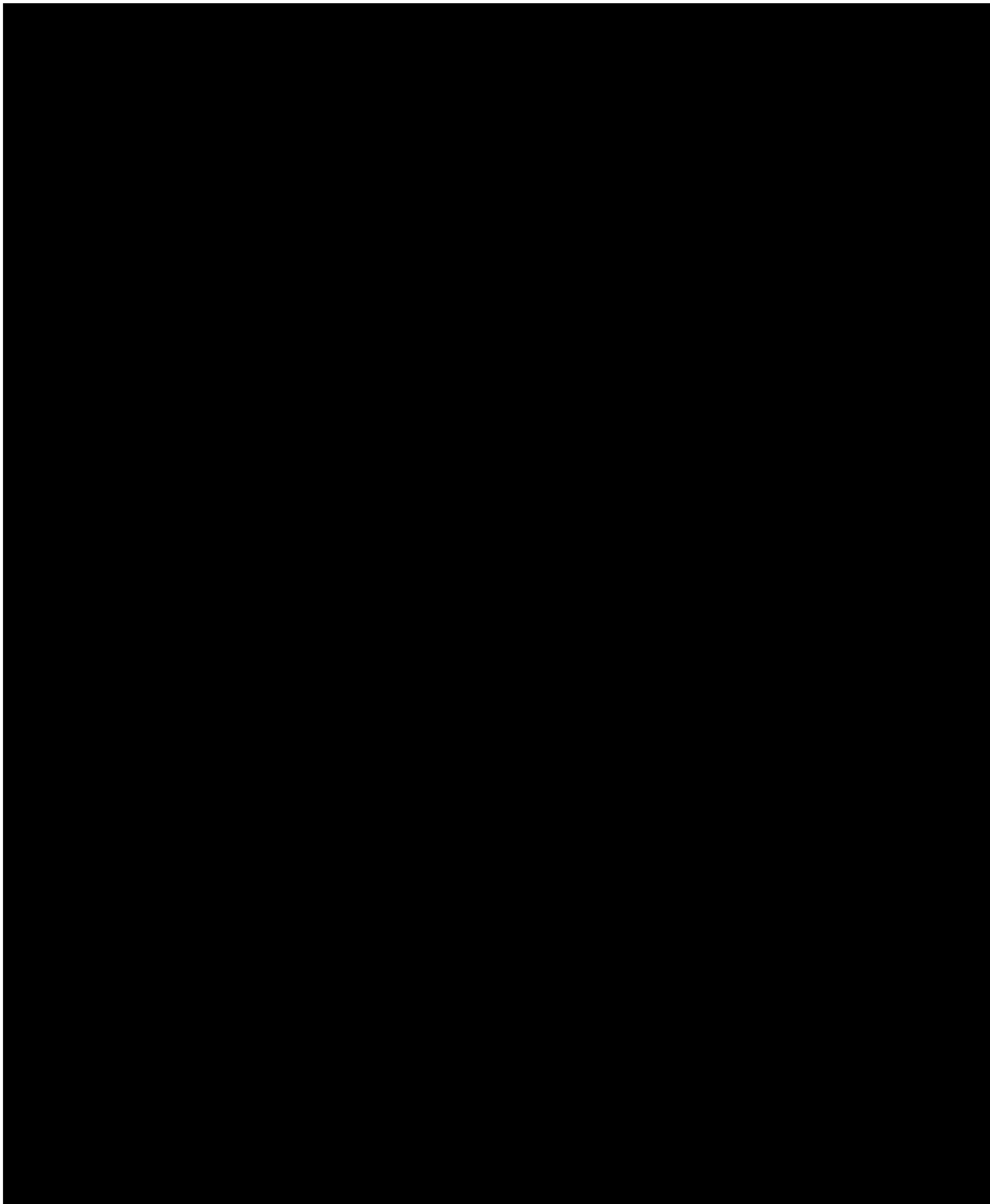
Authored By: Marshall Dunham	<u>Blanchard Refining Company LLC</u> WTP1- WTGP2 FREEZE PROTECTION PREPARATION	Doc. No.: ROP-053-5063 of 421	
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Approved By: Scott Evans		Galveston Bay Refinery	
Date Approved: 11/11/2019		Next Review Date: 11/11/2024	Effective Date: 11/11/2019



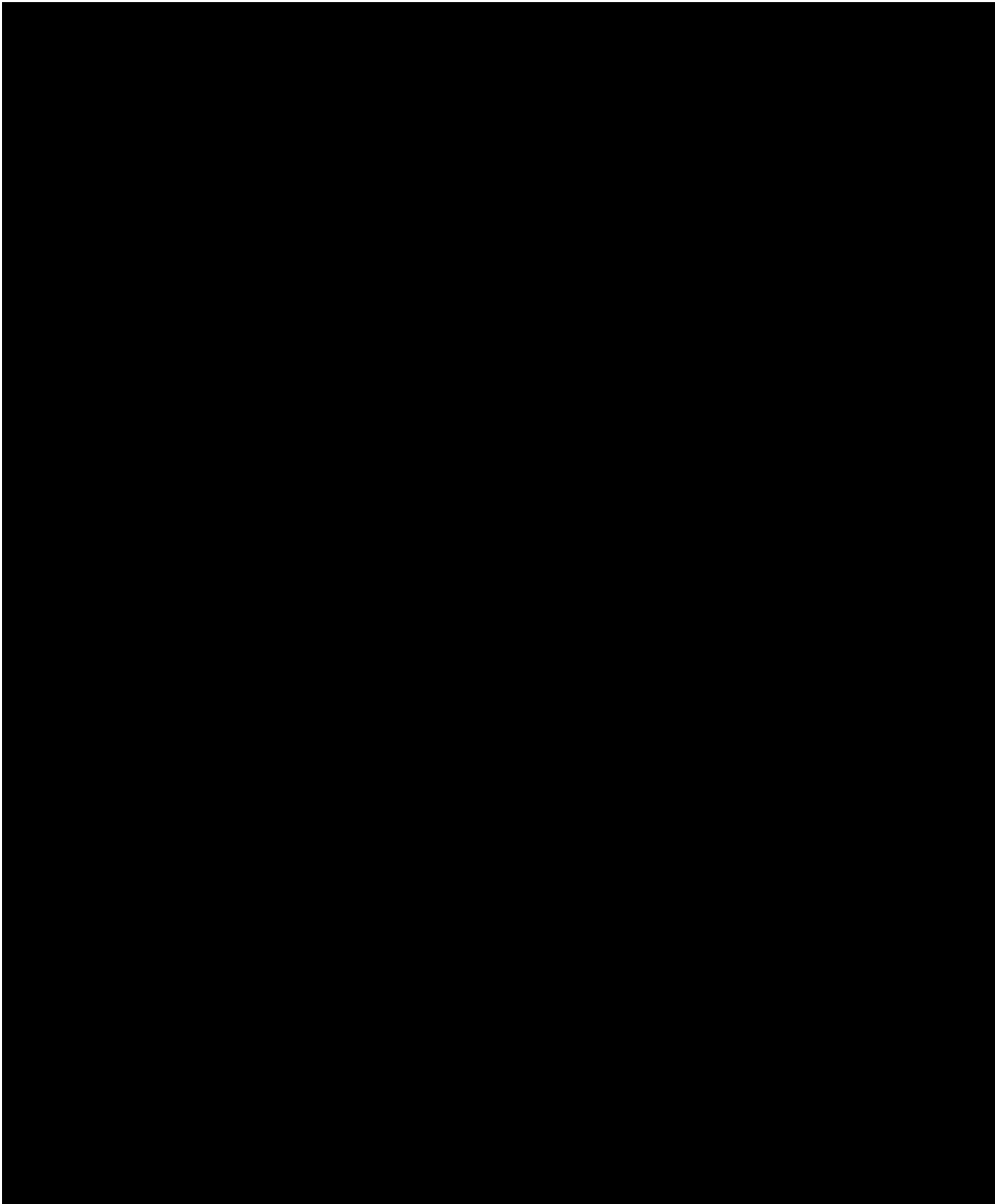
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 2	Page 9 of 17
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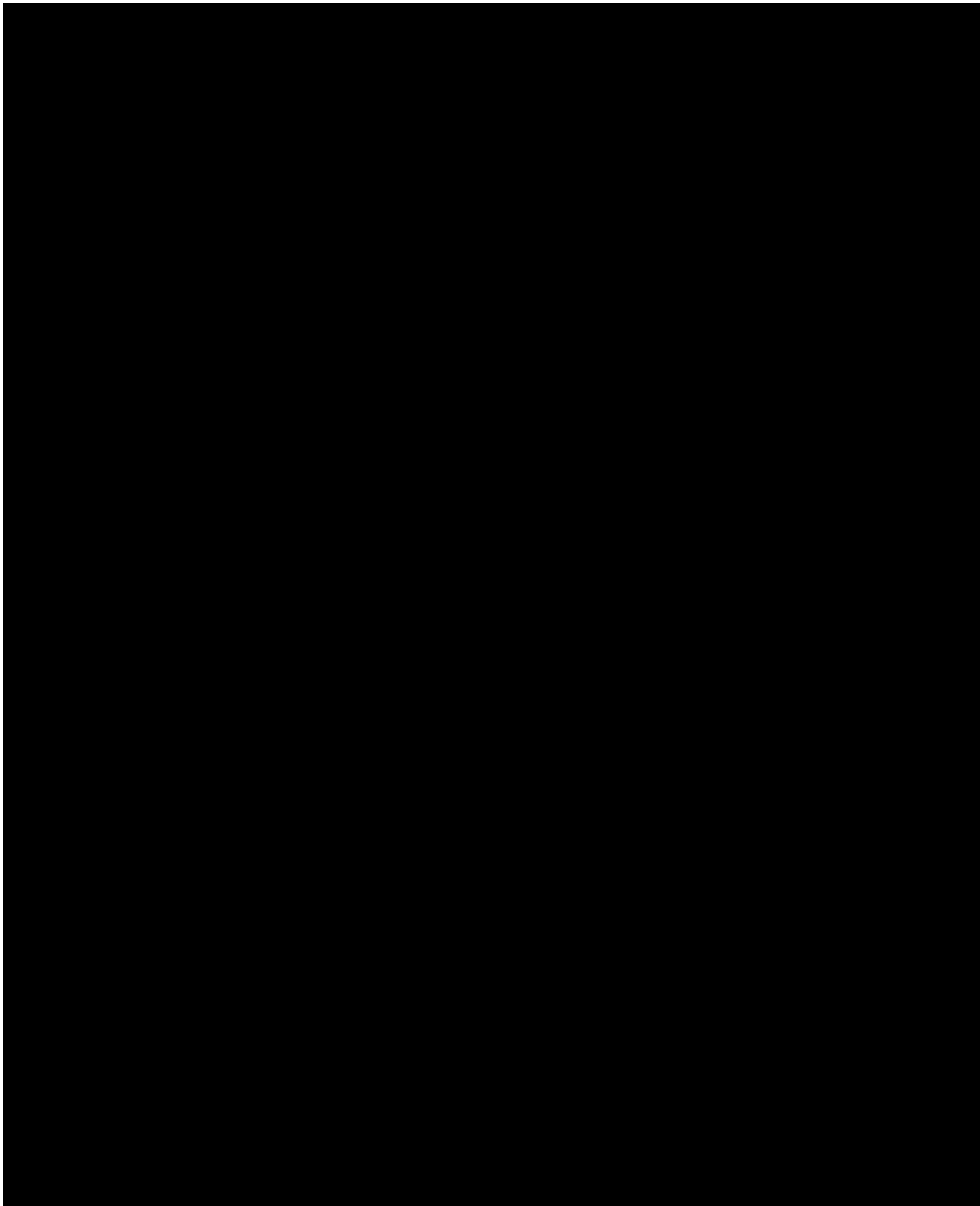
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 2	Page 10 of 17
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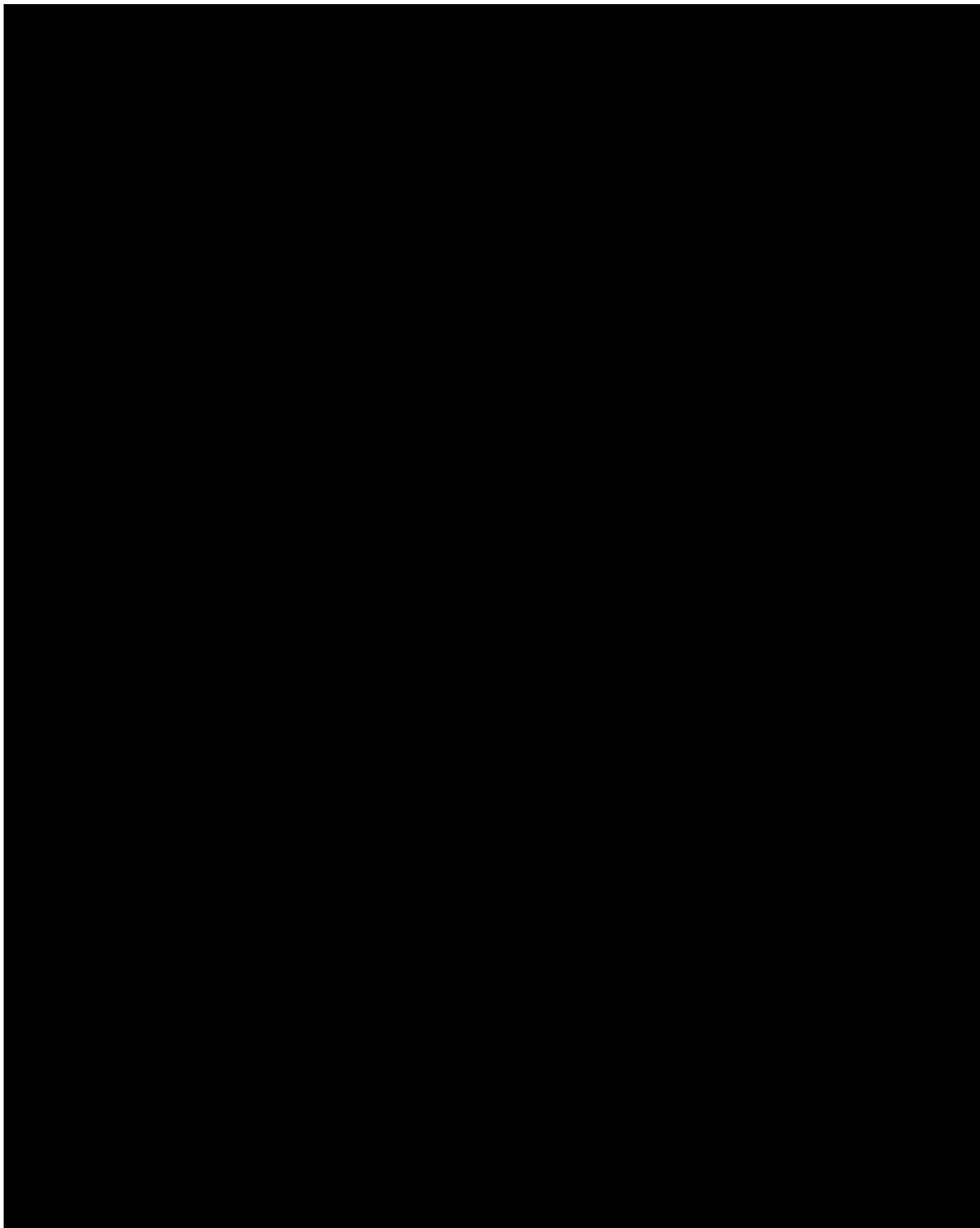
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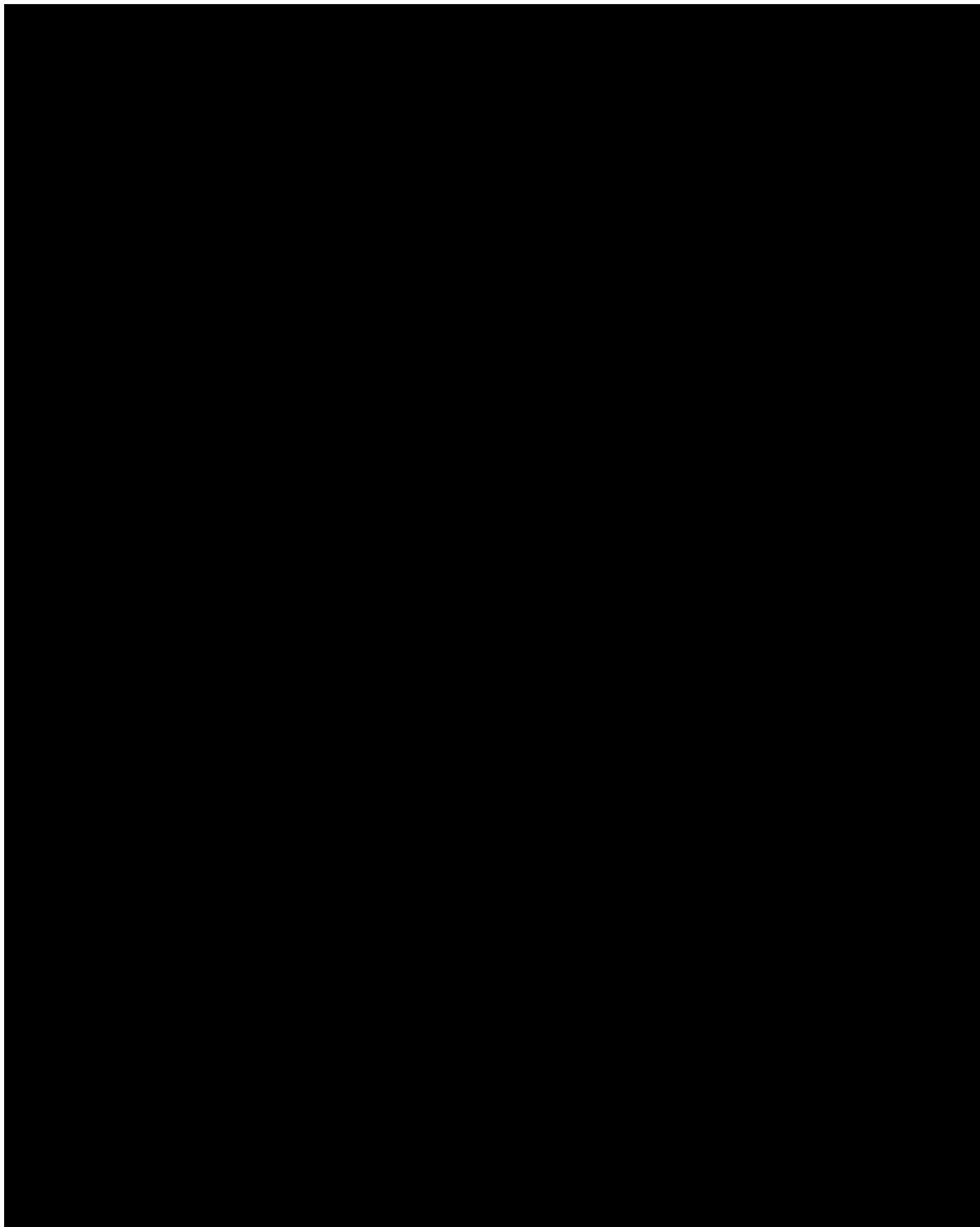
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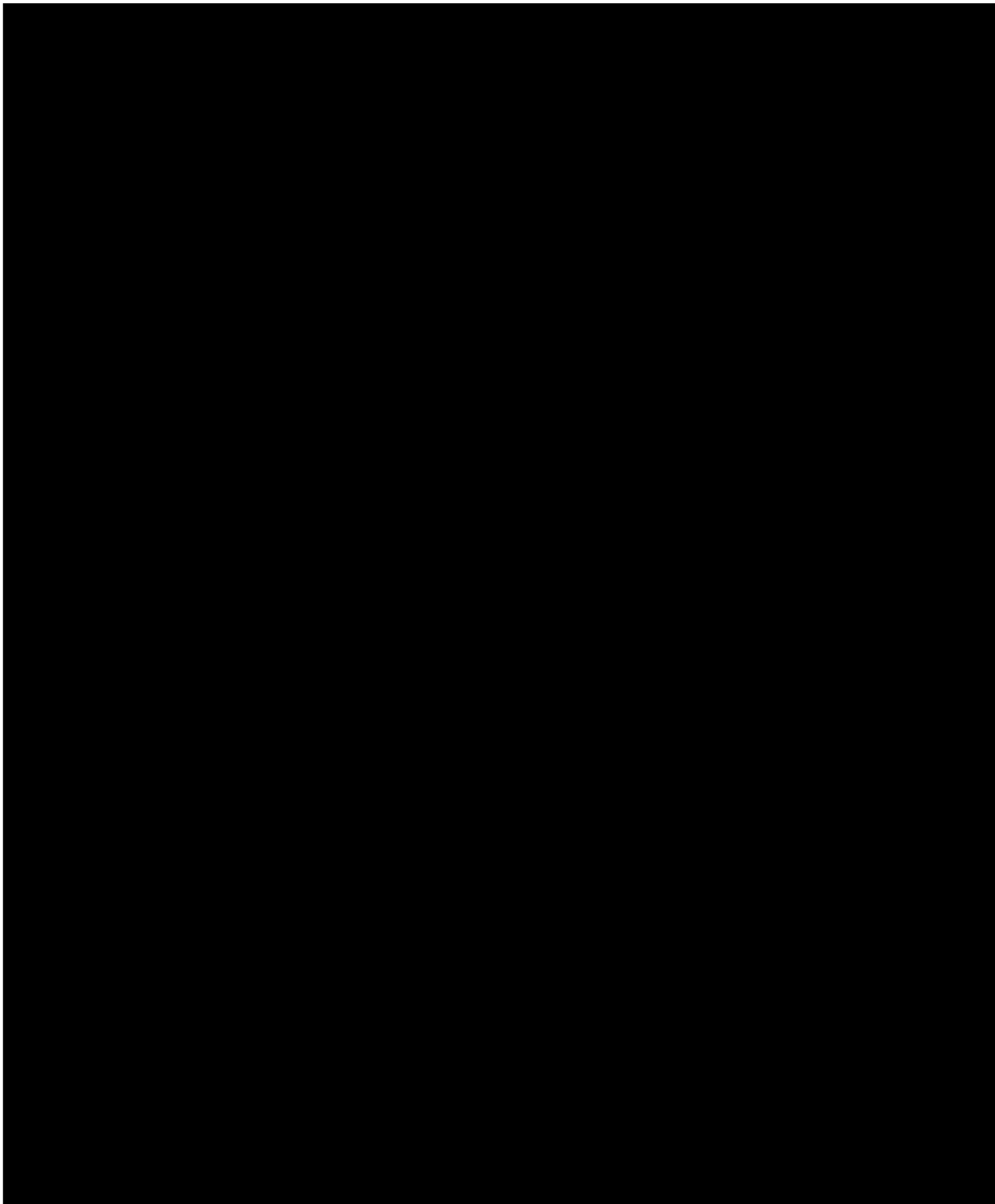
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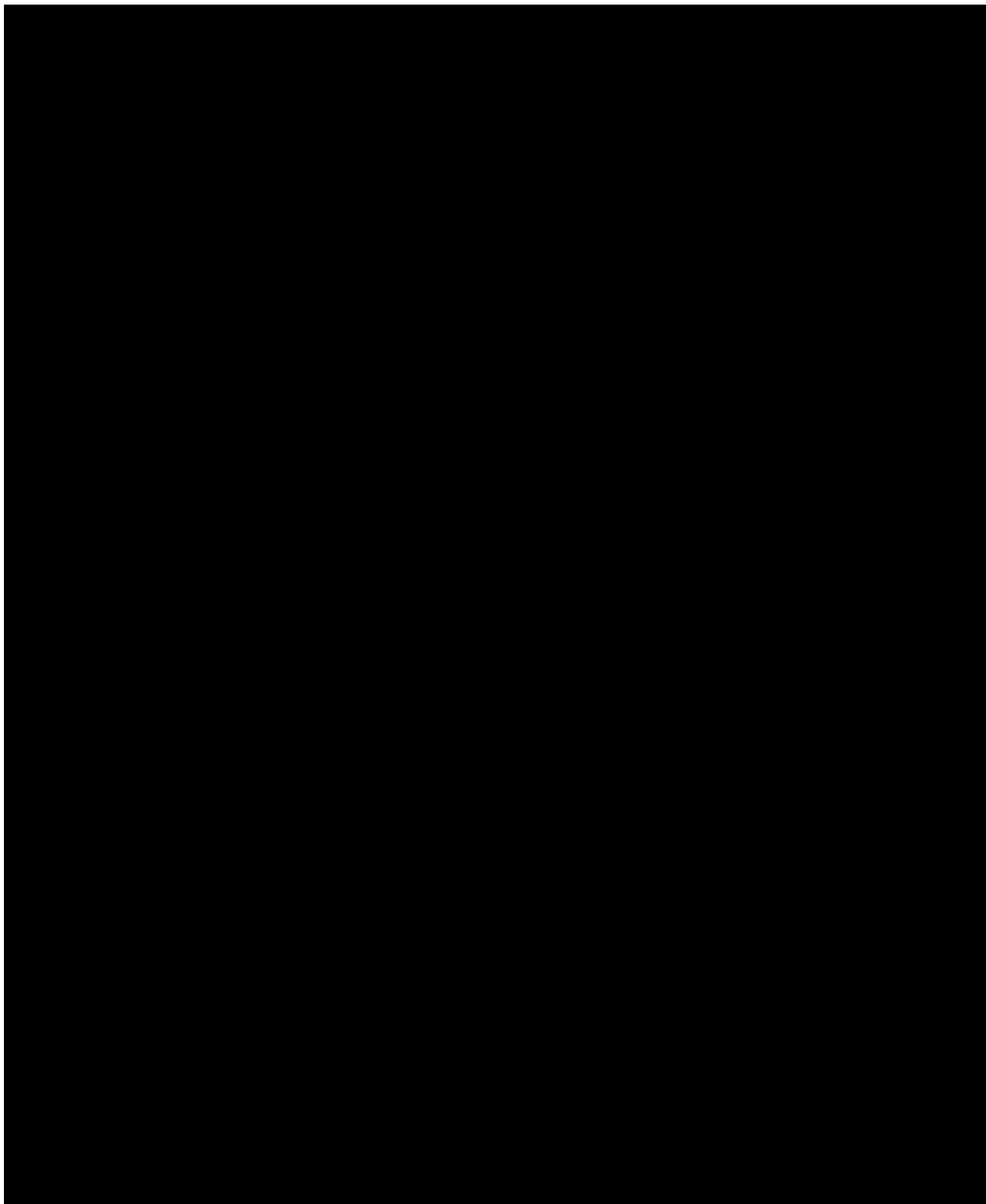
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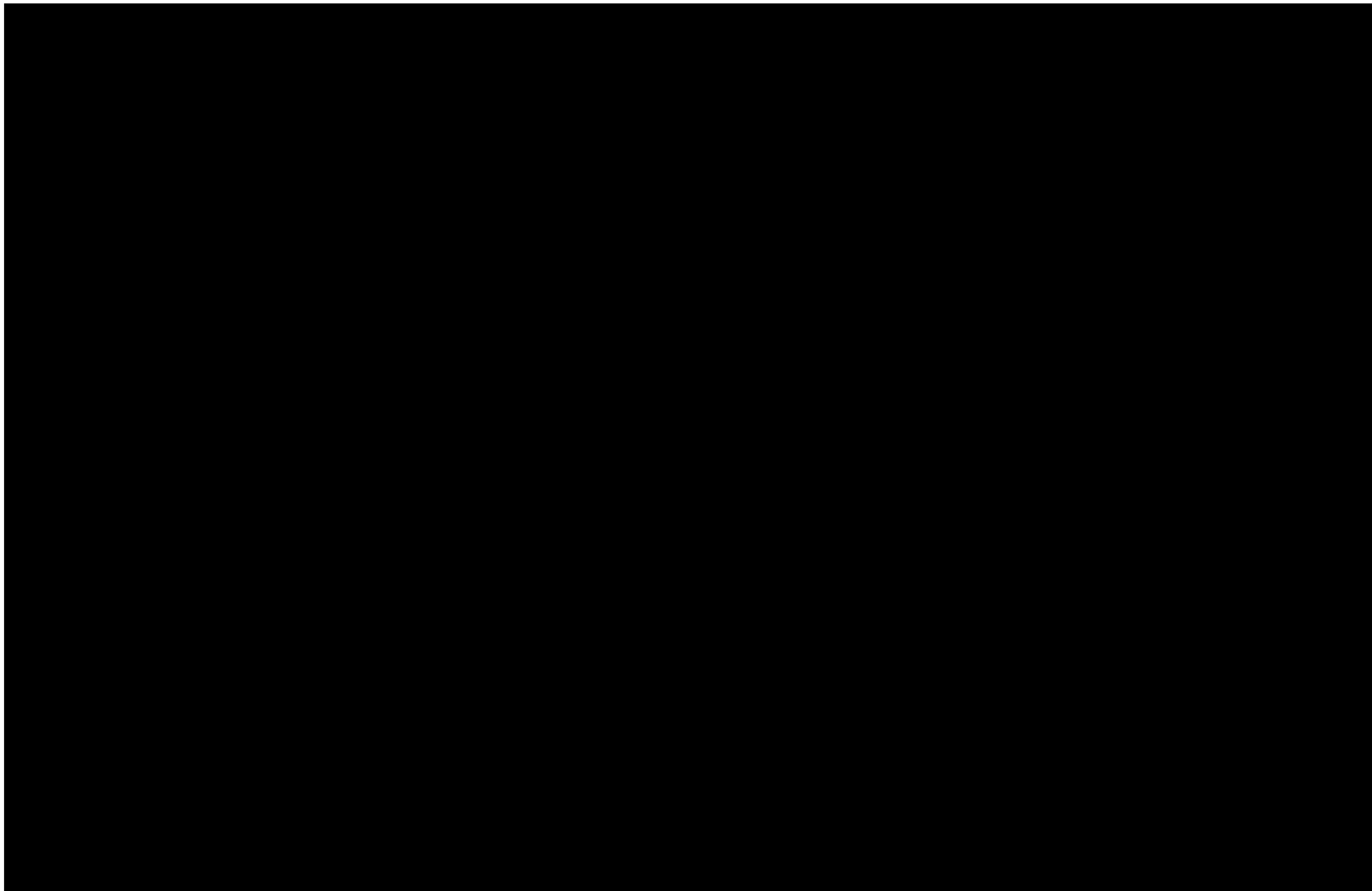
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 2	Page 15 of 17
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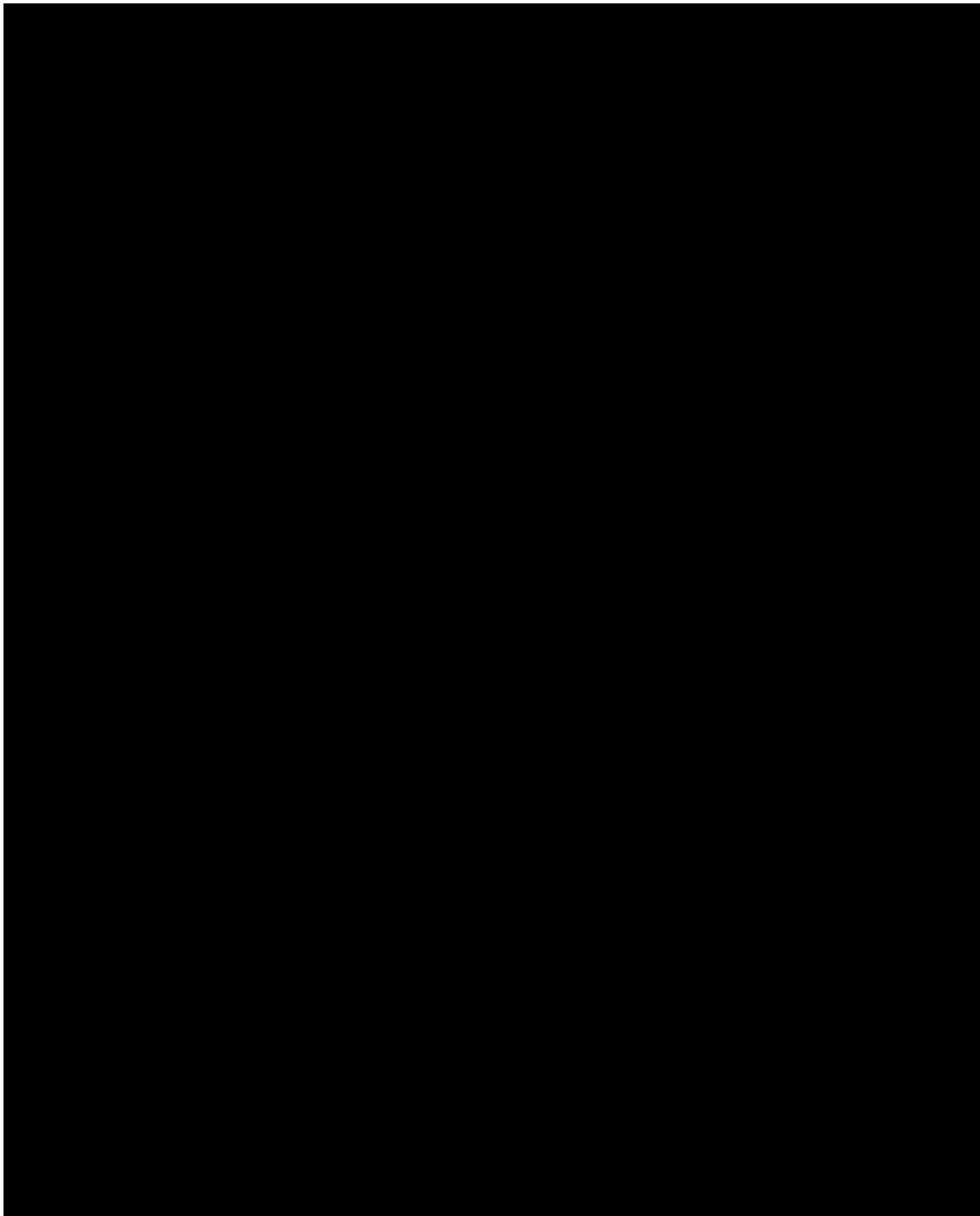
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 2	Page 16 of 17
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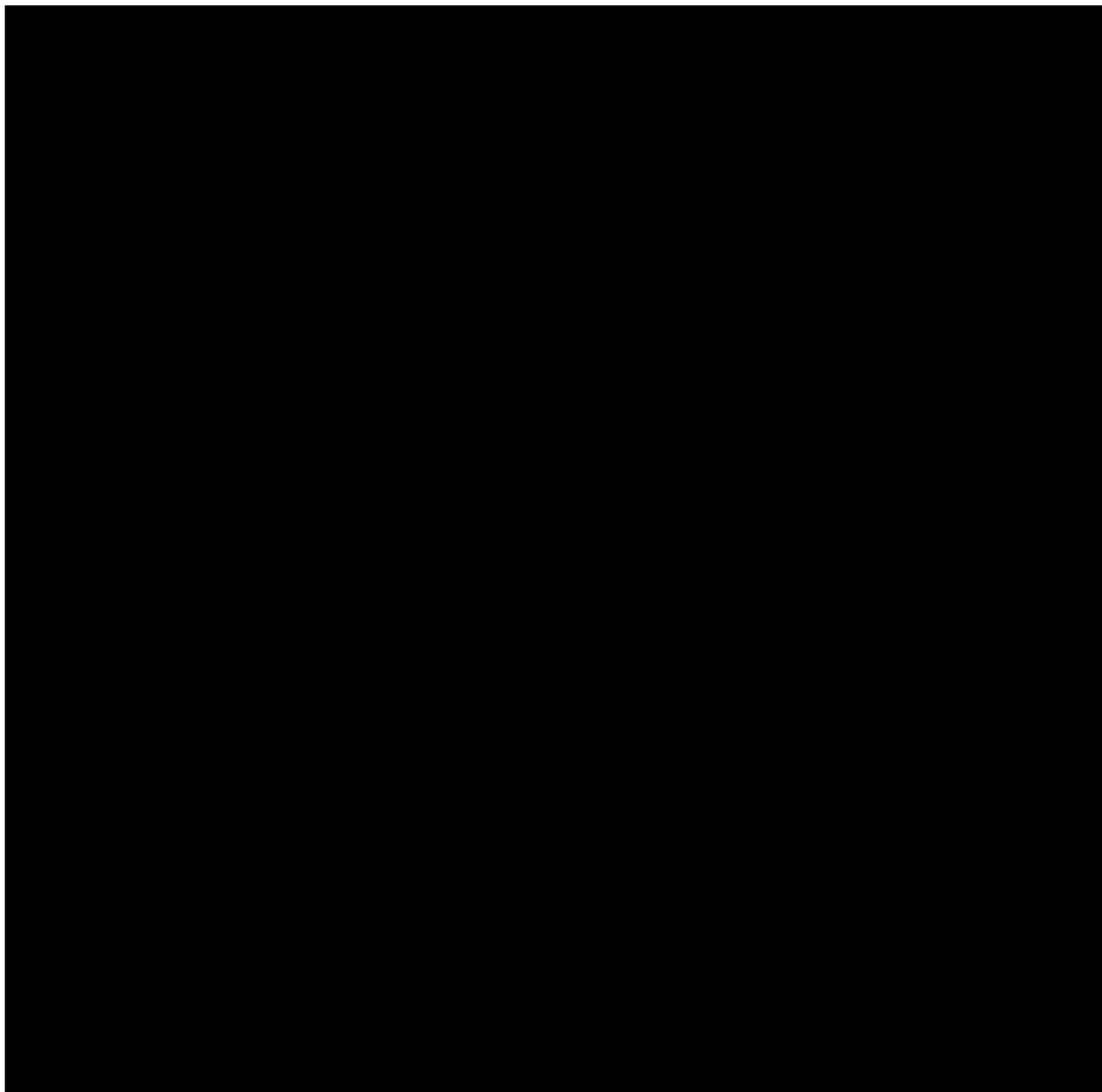
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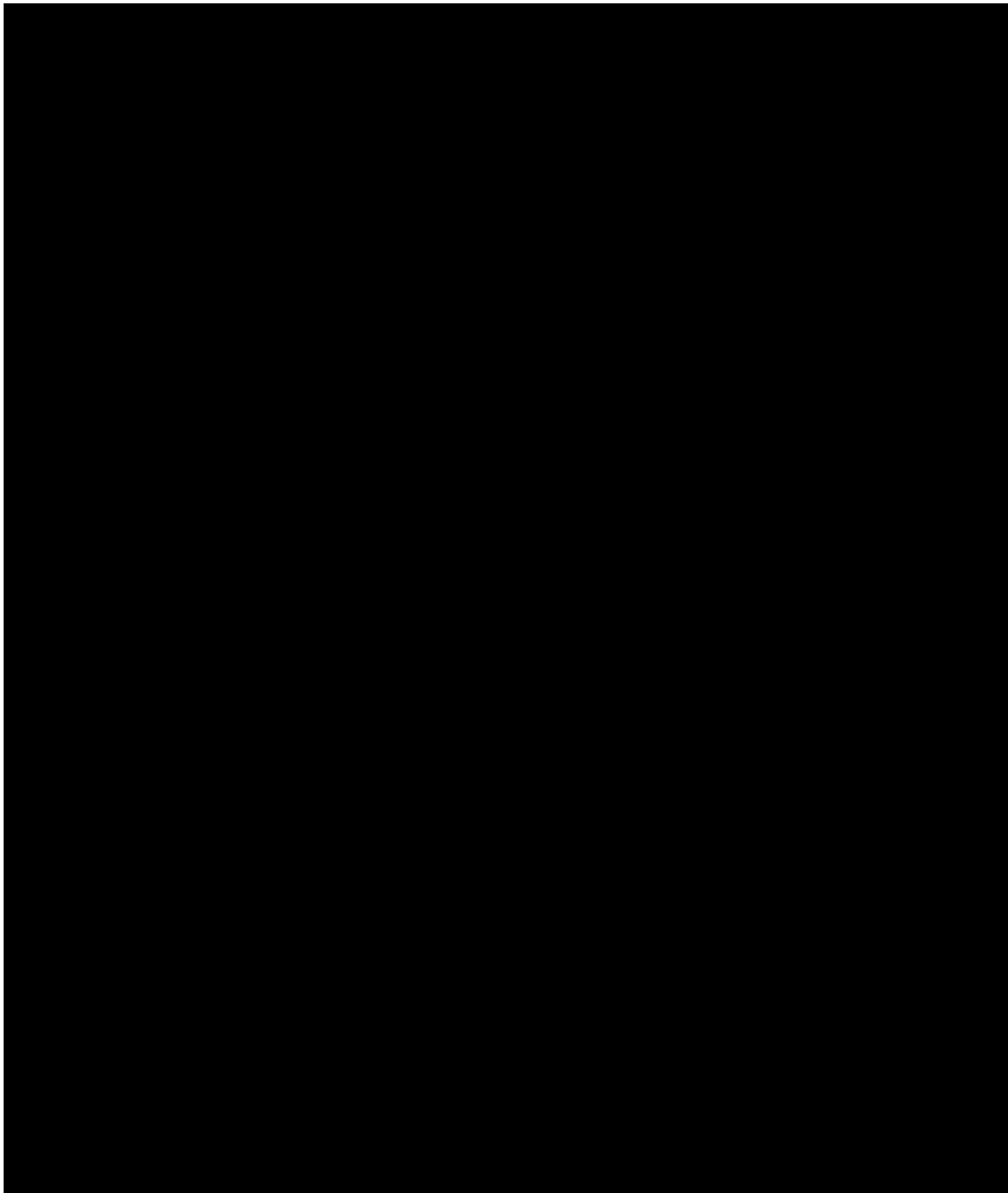
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 1	Page 2 of 7
Approved By: Scott Evans		Galveston Bay Refinery	
Date Approved: 02/26/2018		Effective Date: 02/26/2018	
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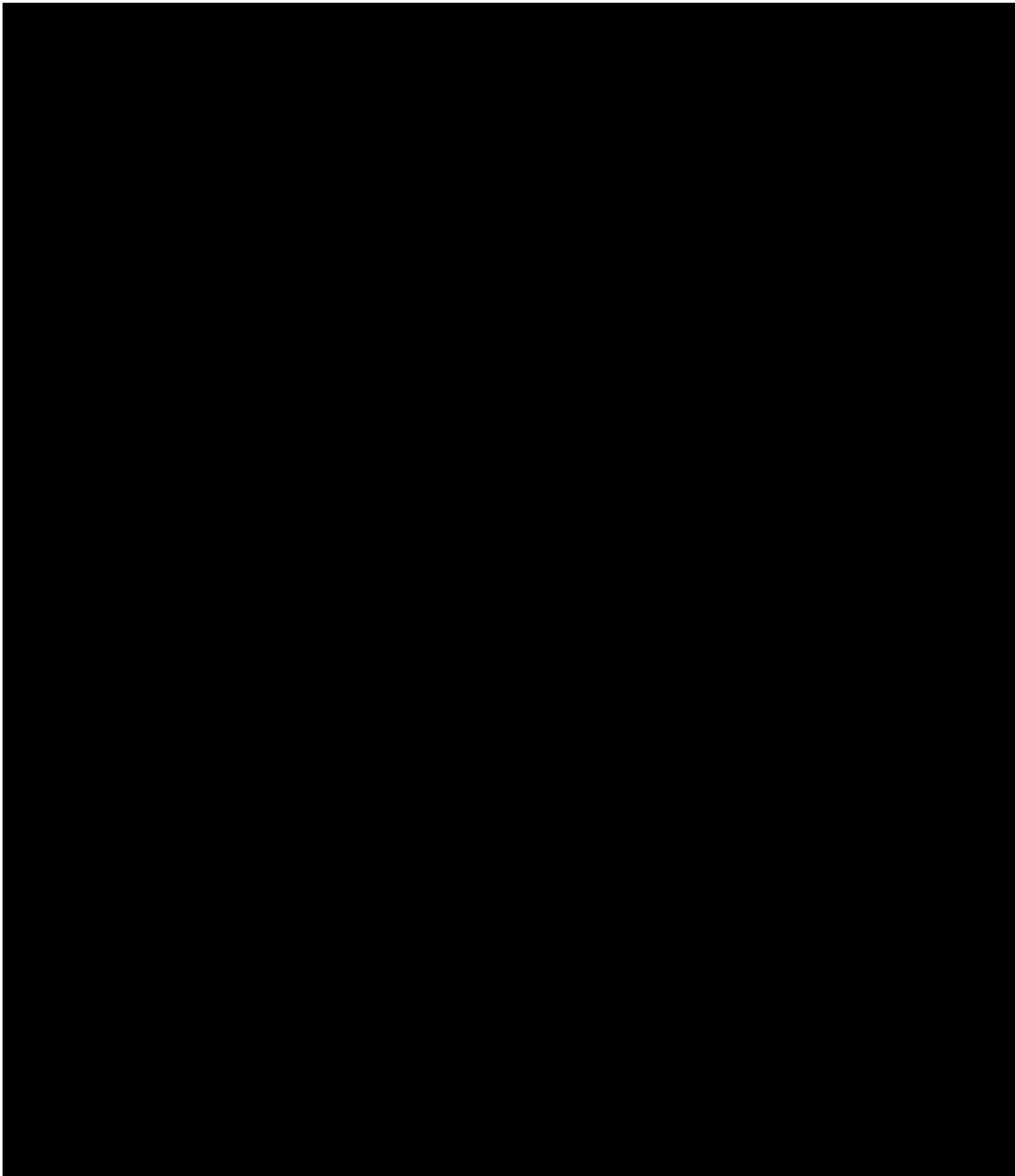
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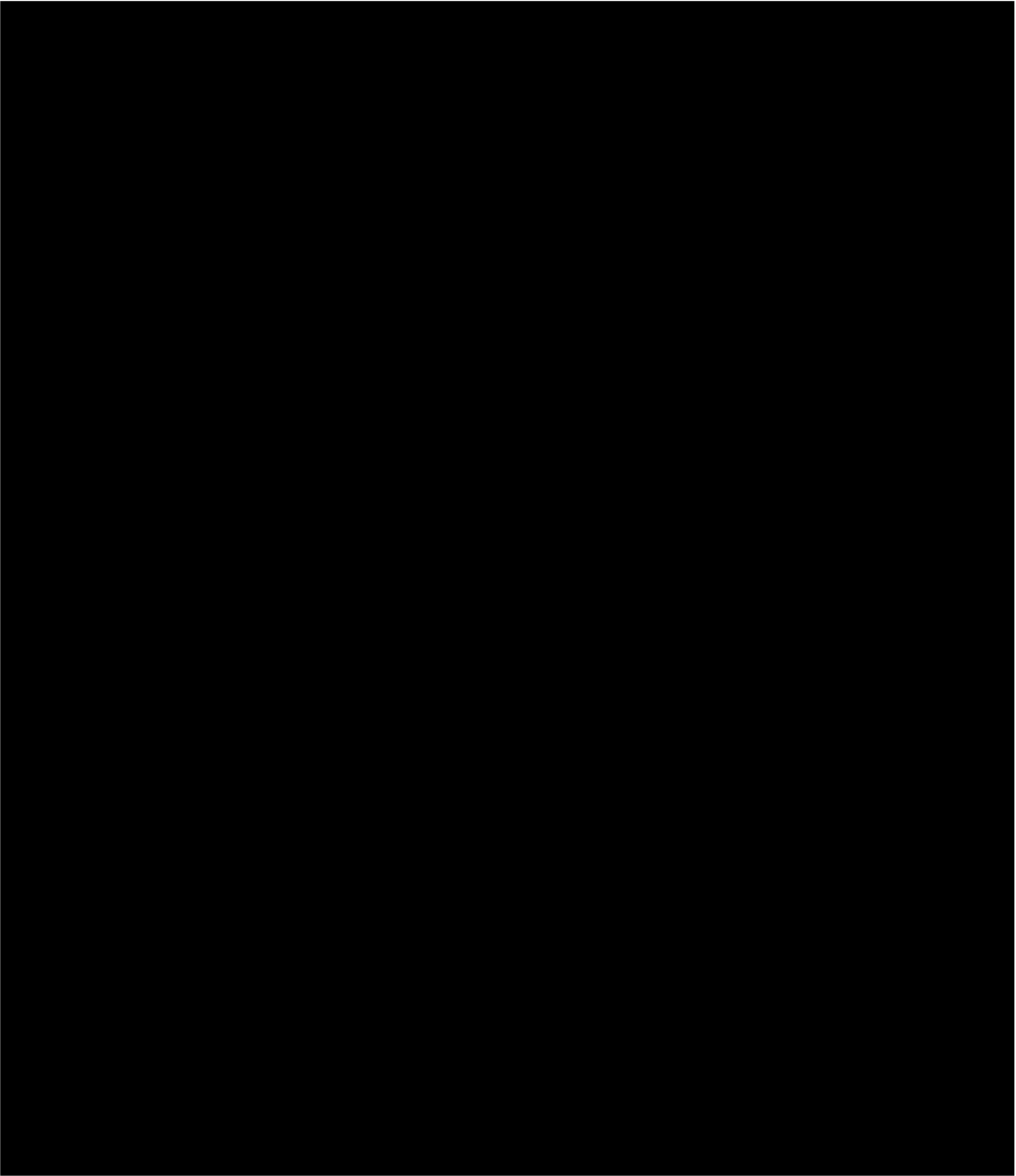
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 1	Page 3 of 7
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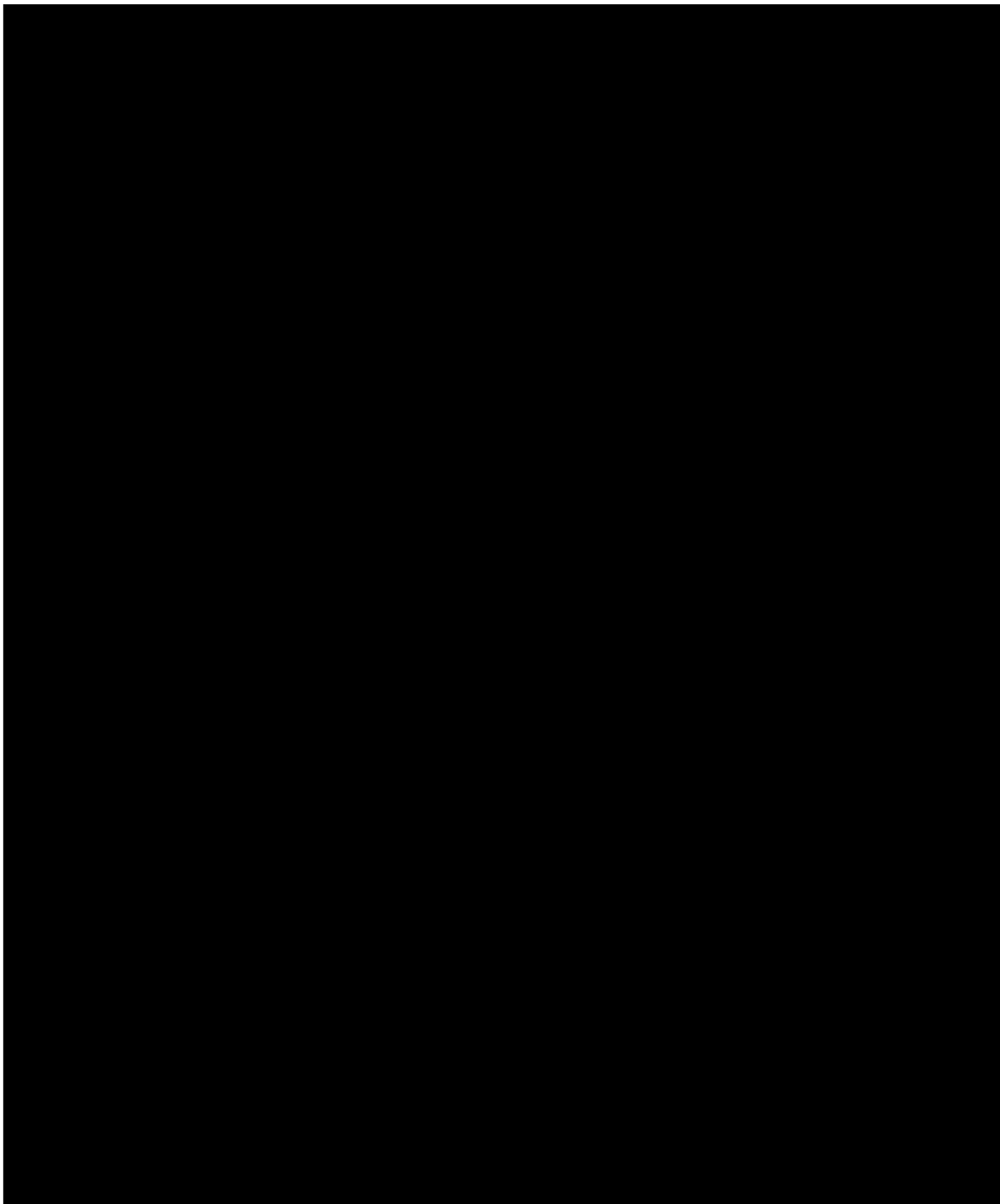
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 1	Page 4 of 7
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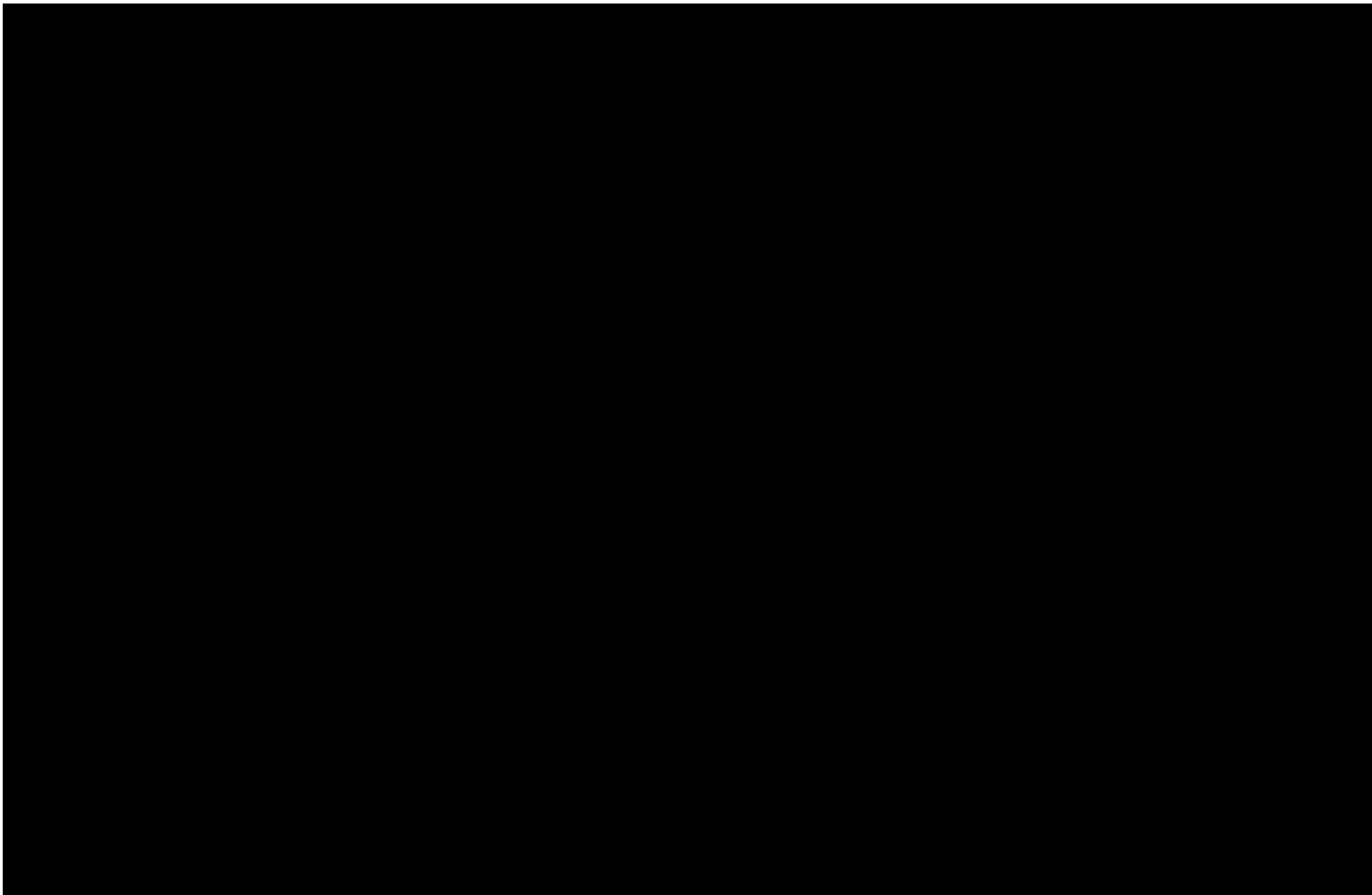
Authored By: Sonya Diaz	<u>Blanchard Refining Company LLC</u> WTP1-WTGP2 FREEZE PROTECTION EXECUTION	Doc. No.: ROP-0503-5002	
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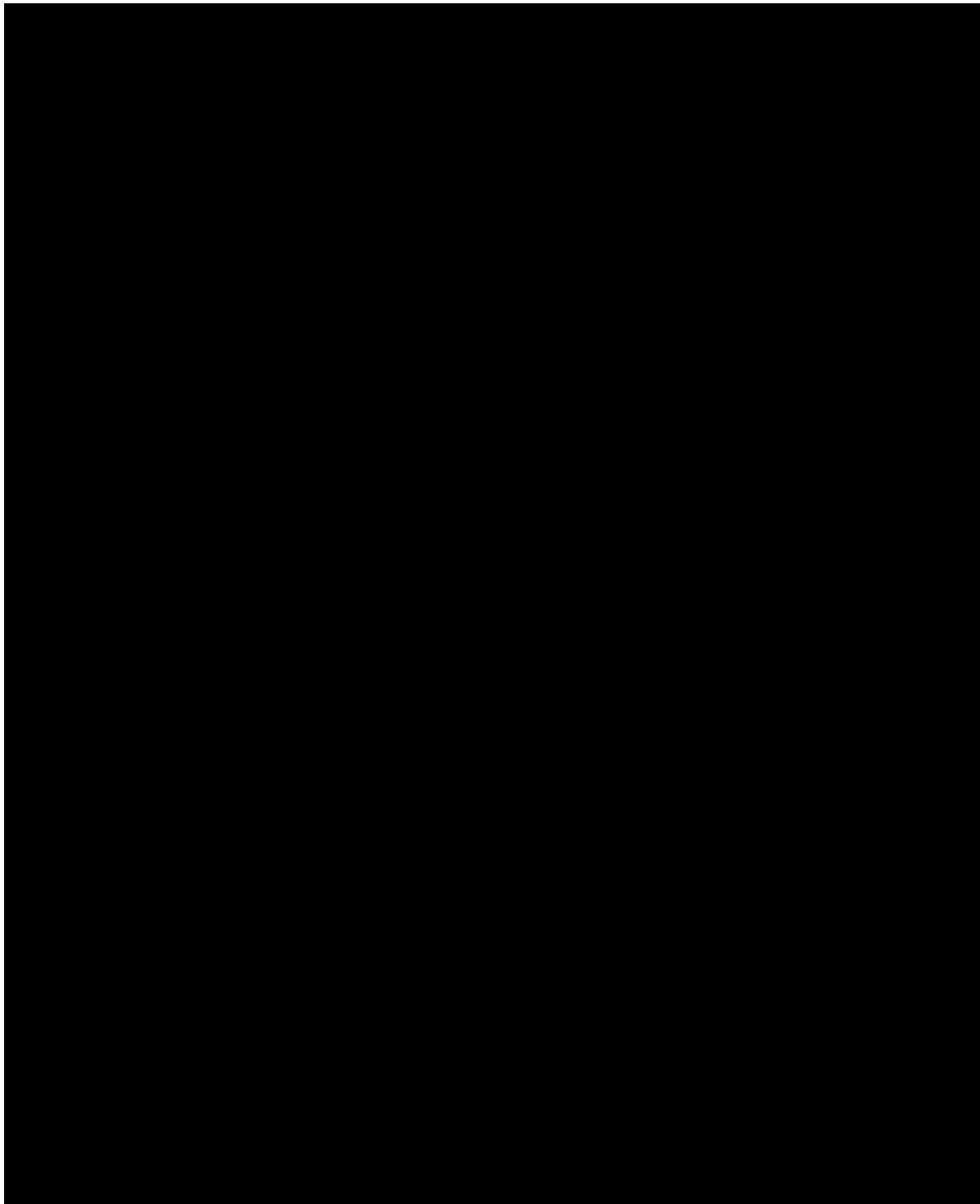
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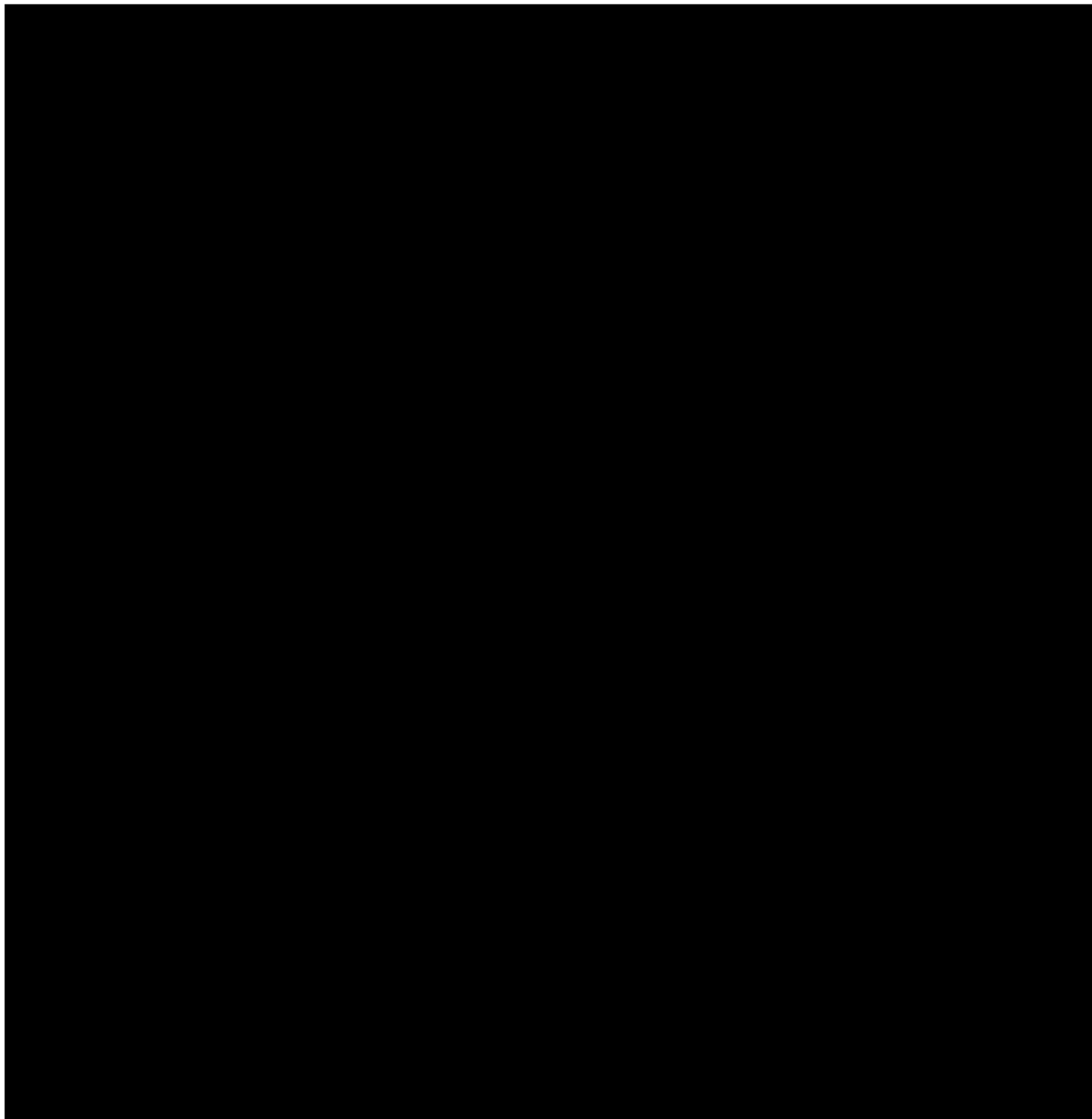
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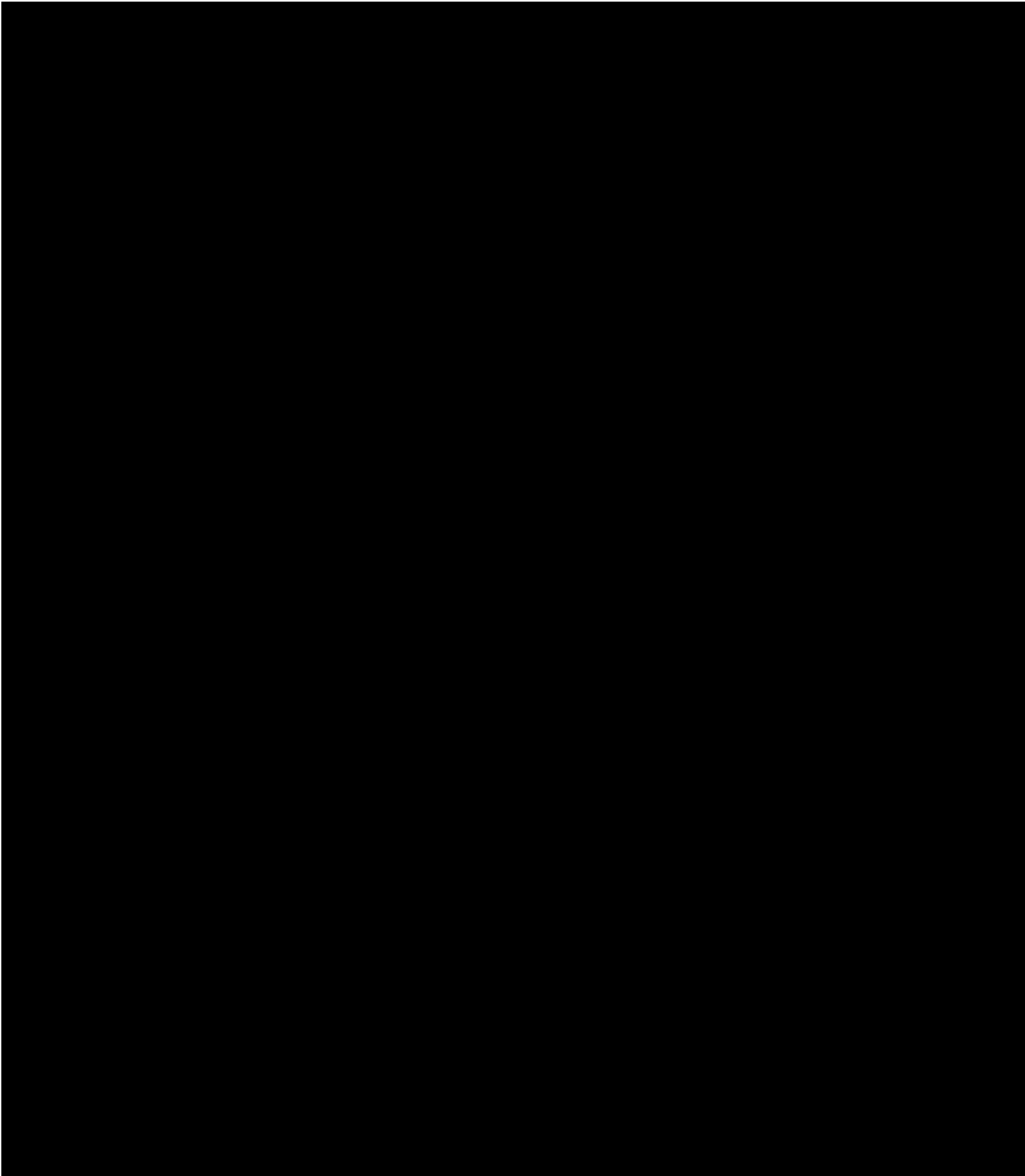
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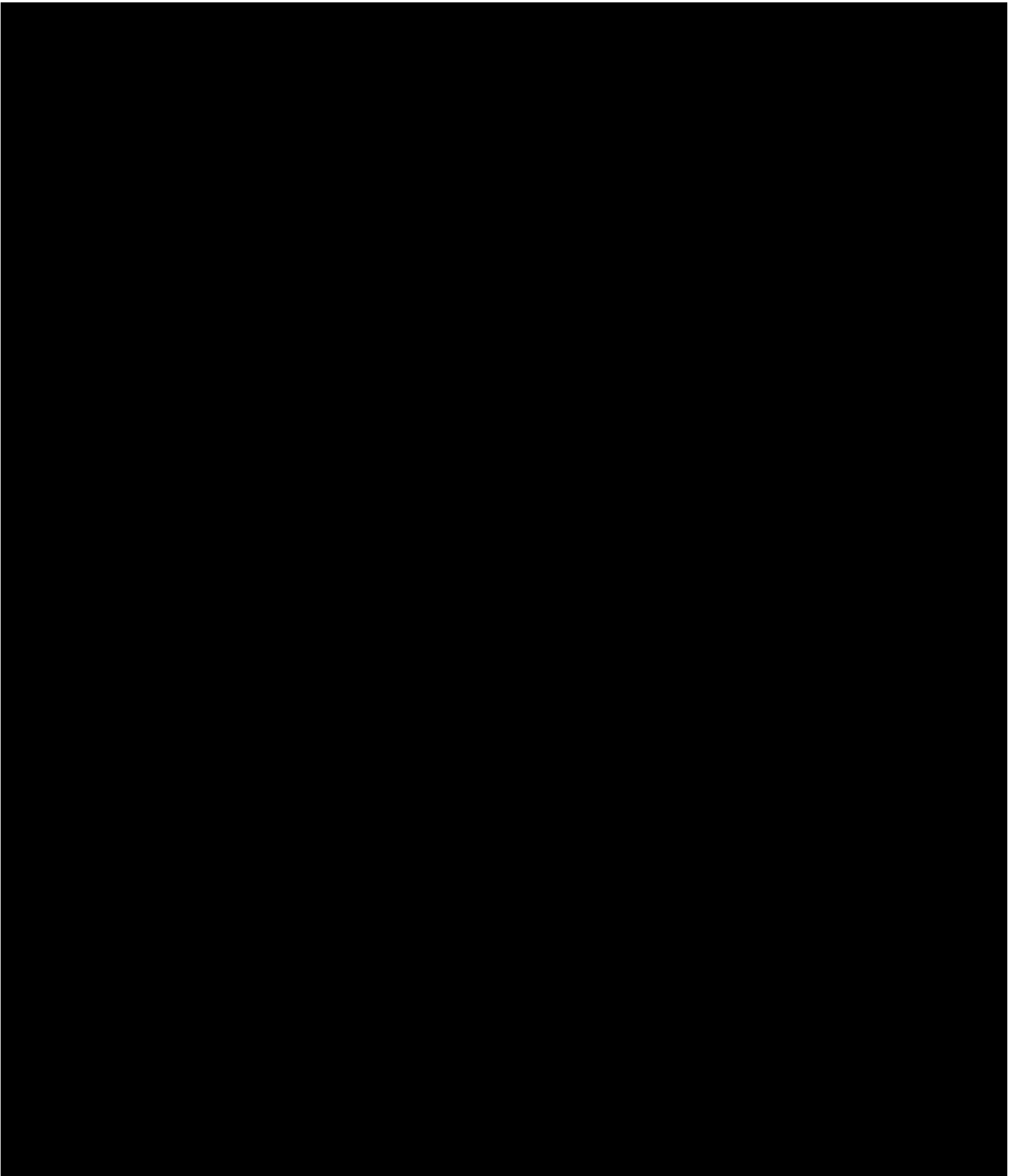
- 1.1 This Procedure provides detailed instructions to prepare WTP4 for potential freezing or near freezing weather conditions.



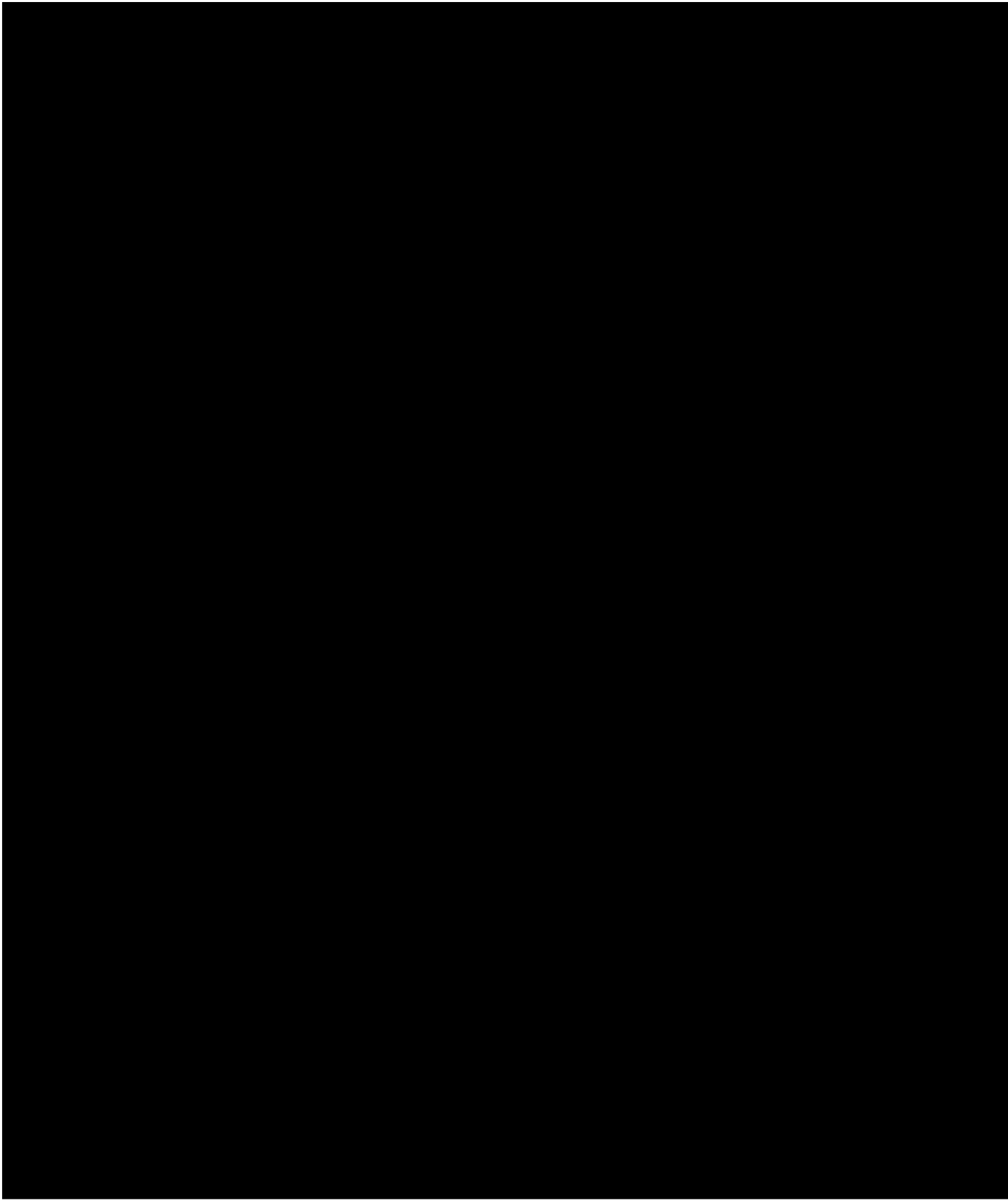
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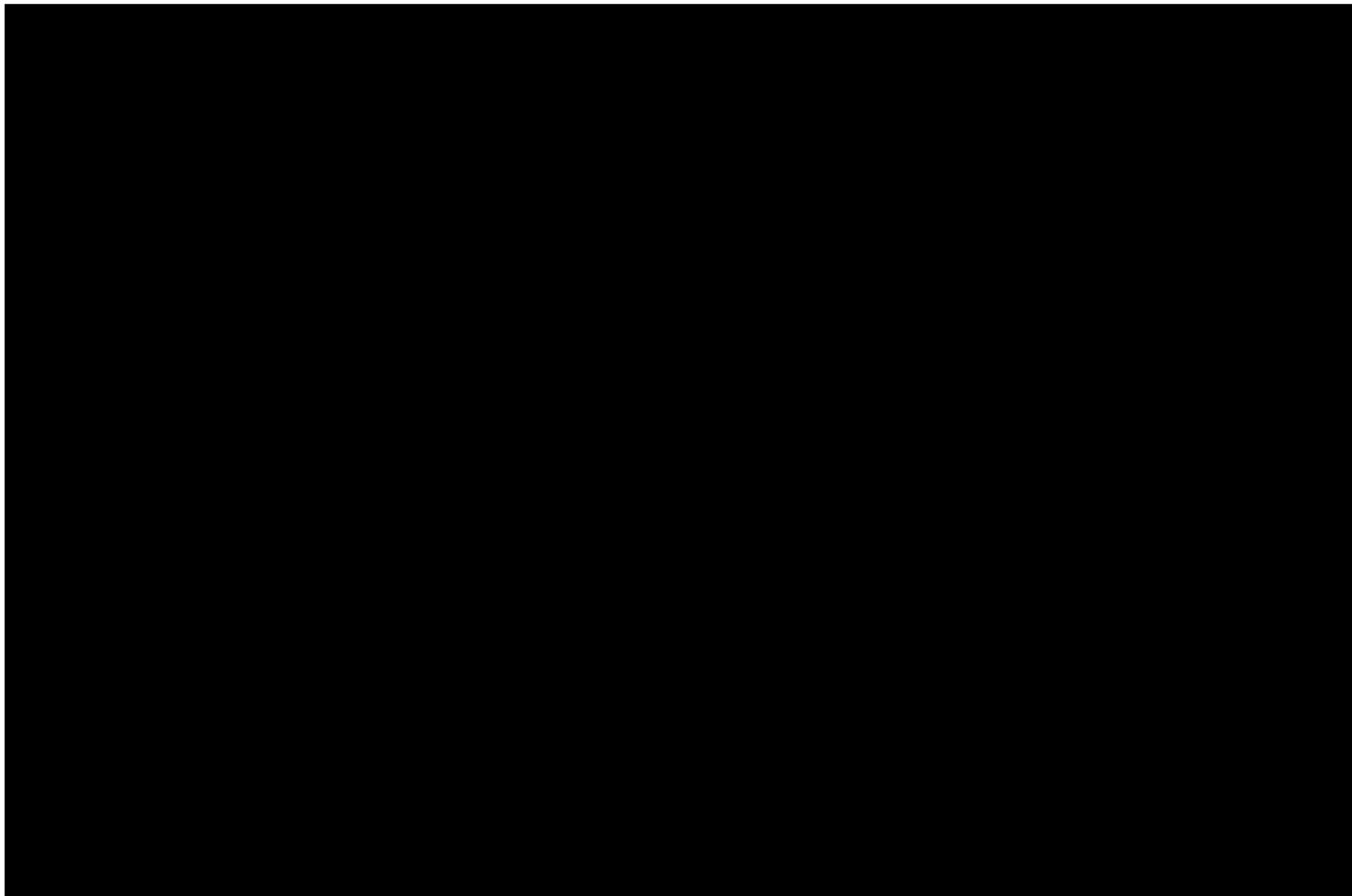


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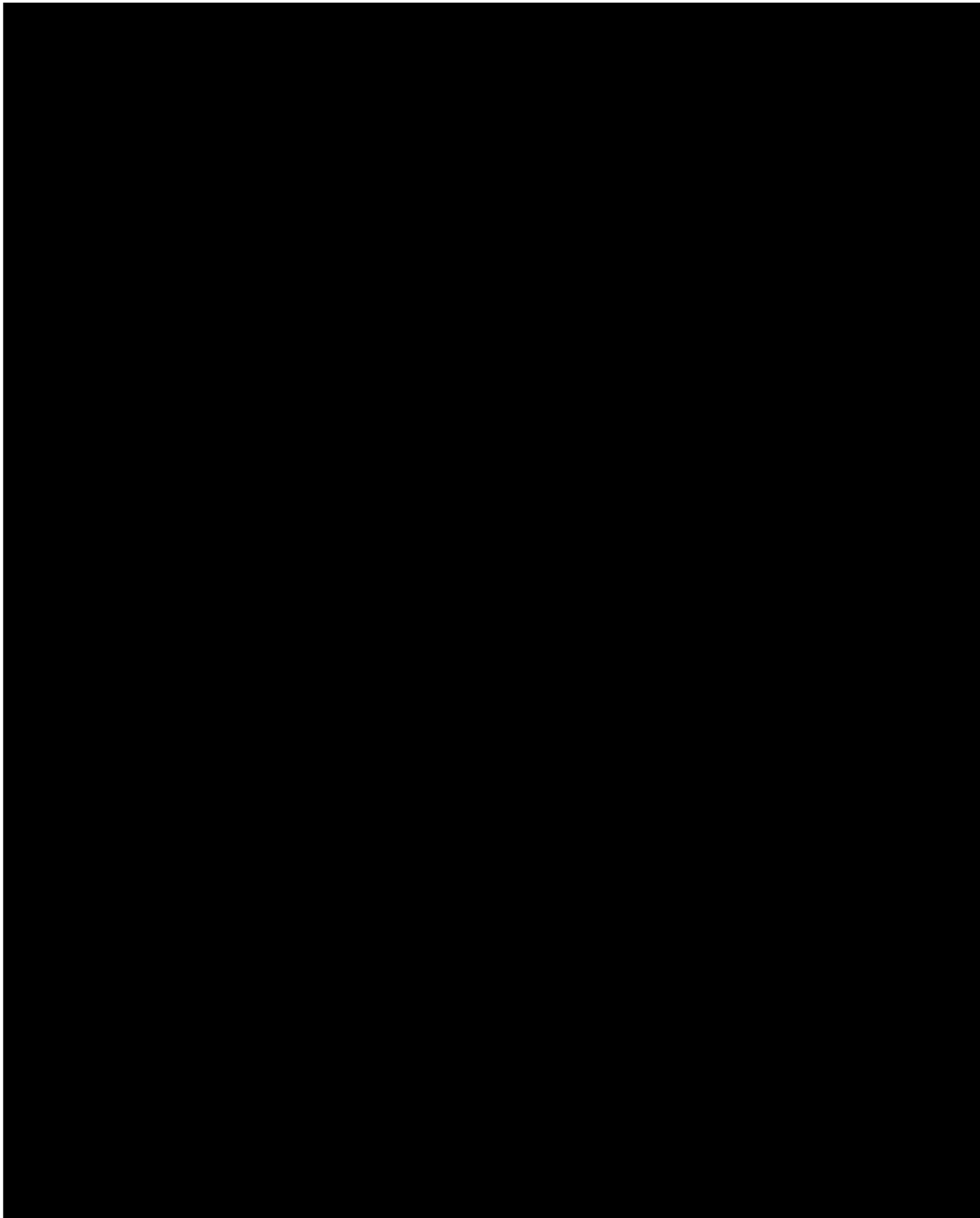


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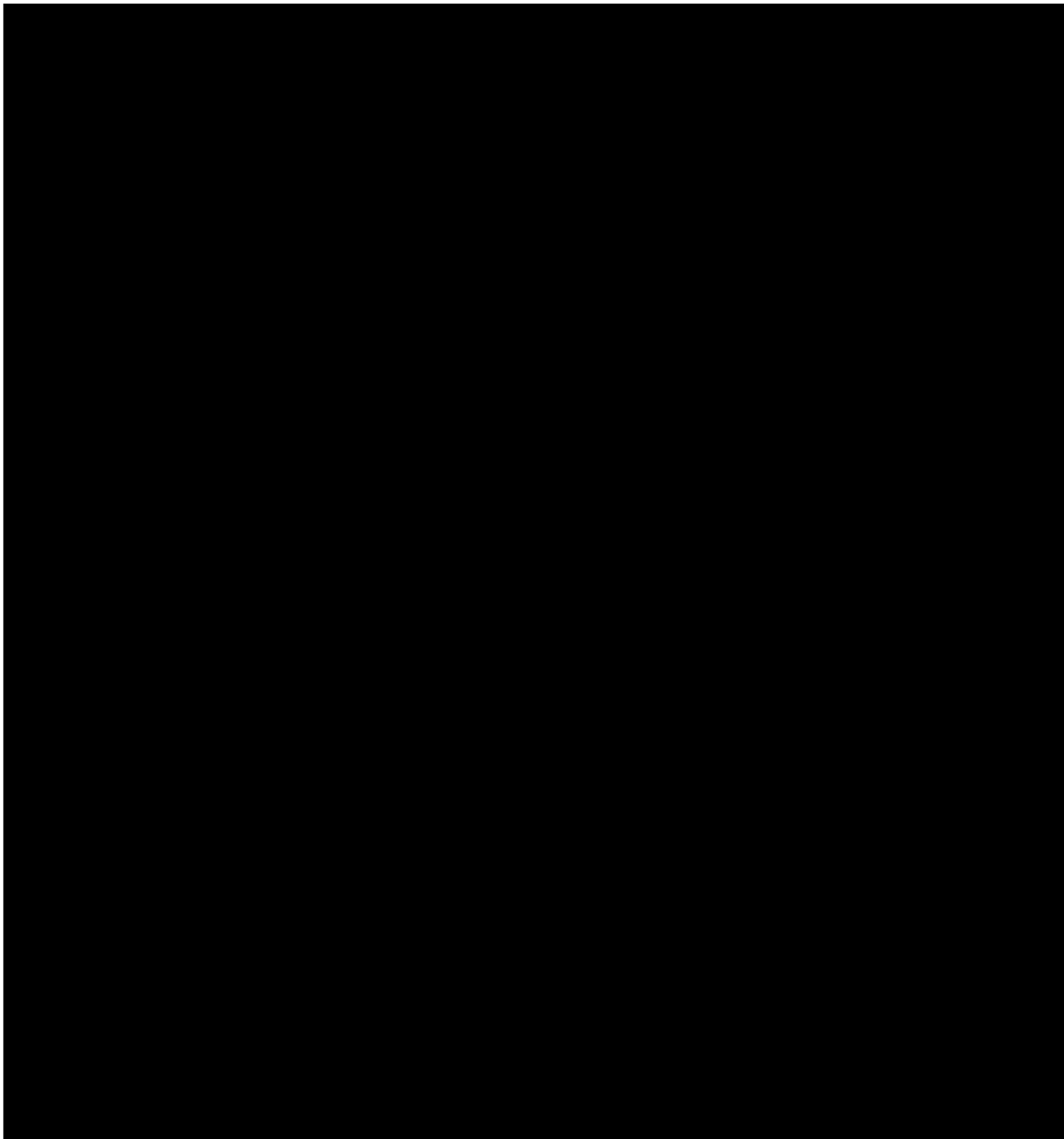
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Doc Custodian: Area 6 Process Specialist		Rev. No.: 1	Page 1 of 6
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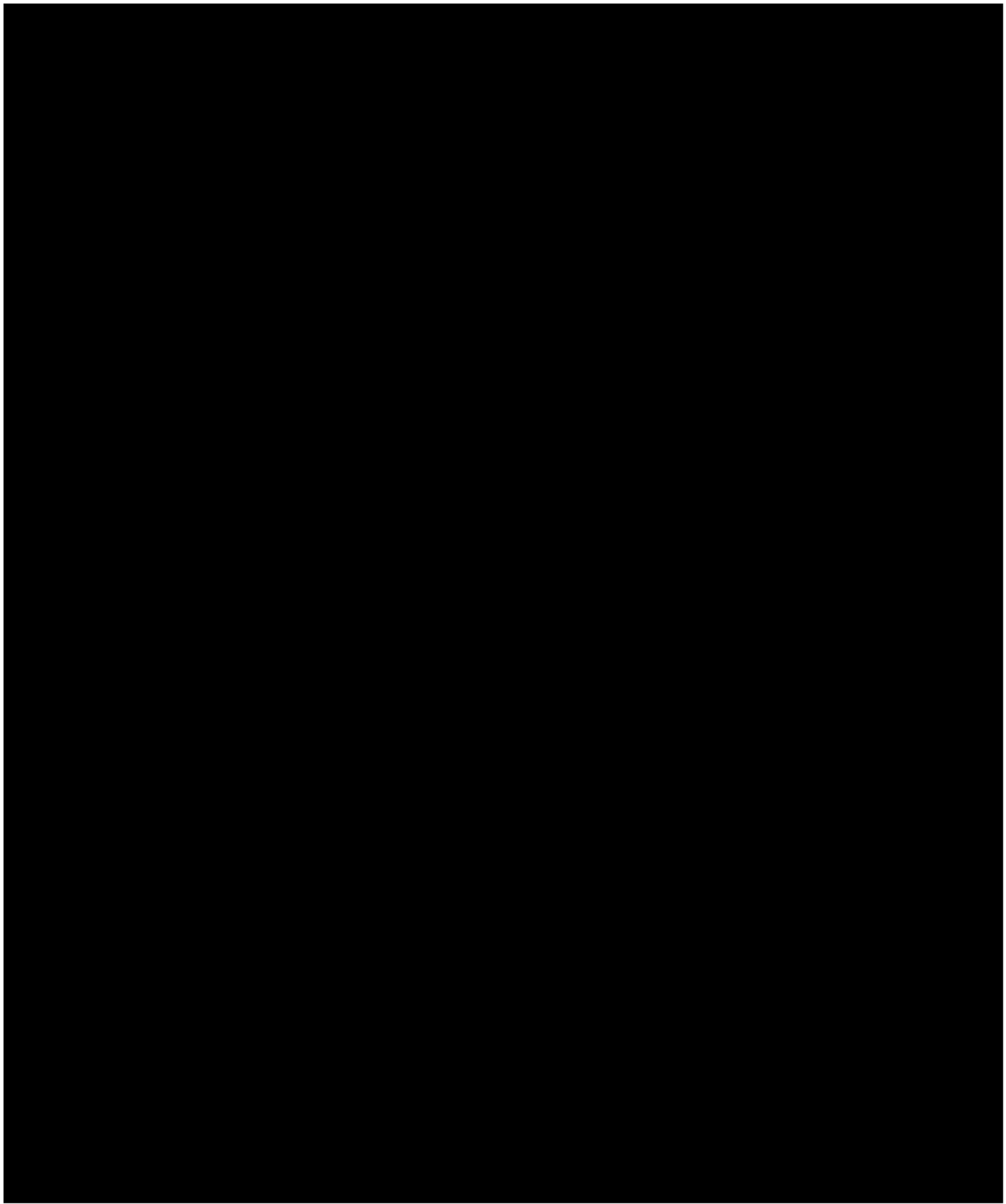
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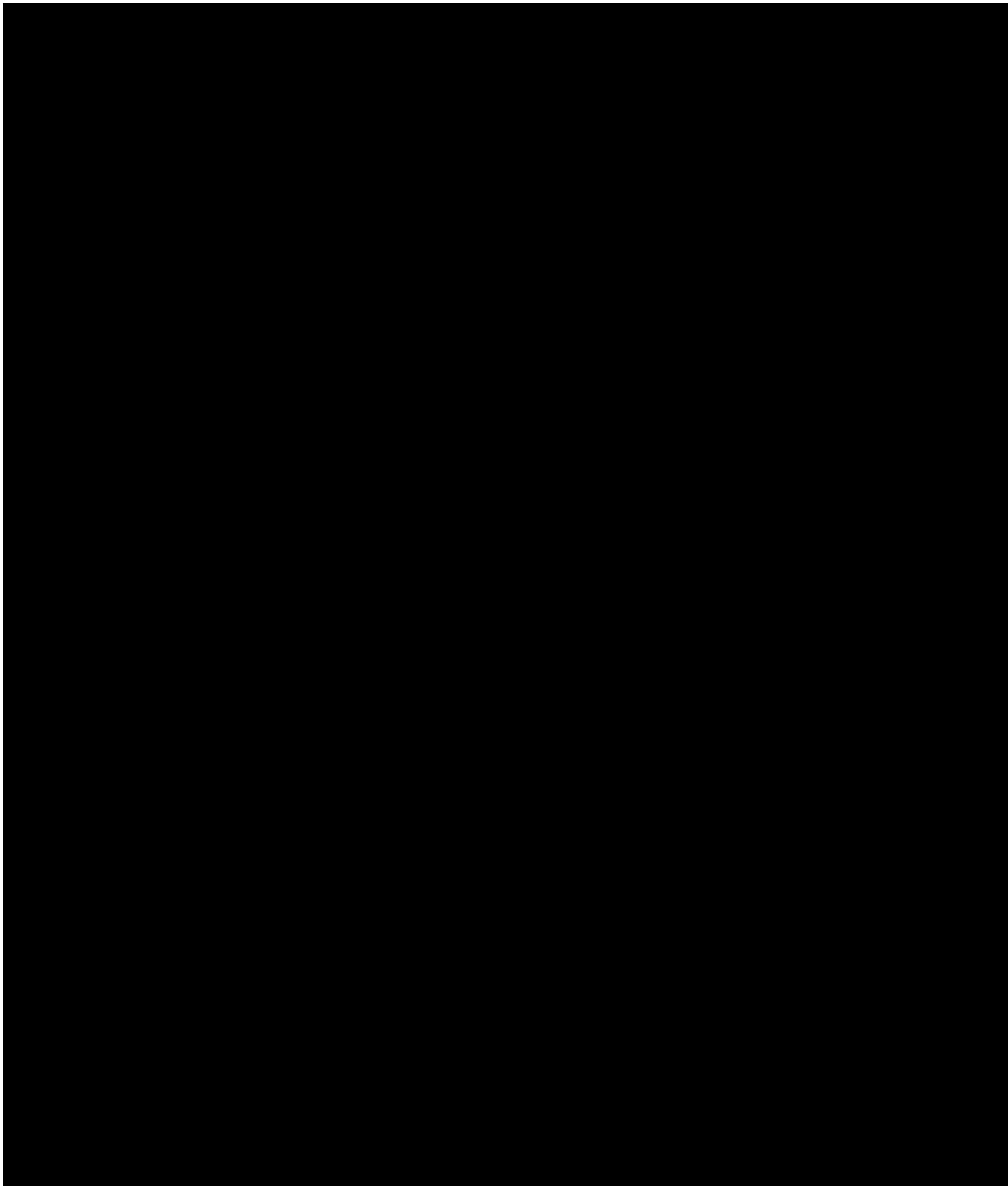
- 1.1 This Procedure provides detailed instructions to energize the WTP4 additional freeze protection equipment such as steam heat and electric heat tracing during freezing or near freezing weather conditions.



Authored By: Sonya Diaz	<u>Blanchard Refining Company LLC</u> WTP4 FREEZE PROTECTION EXECUTION	Doc. No.: ROP-055-5089 of 421	
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