



**U.S. CHEMICAL SAFETY AND
HAZARD INVESTIGATION BOARD**

SUBPOENA

CASE NAME: Chevron Richmond Refinery **CASE NO.:** 2012-03-I-CA

TO: Chevron U.S.A. Inc.

SERVE: Mark L Farley, Partner, Pillsbury Winthrop Shaw Pittman, LLP

ADDRESS: 2 Houston Center | 909 Fannin | Suite 2000

Houston, TX 77010 - 1018

**PURSUANT TO THE AUTHORITY of the U.S. Chemical Safety and Hazard Investigation Board and its Designee(s) ("Board") under 42 U.S.C. § 7412(r)(6)(C)(i), (L)(i) - (ii), and (M), YOU ARE HEREBY COMMANDED TO APPEAR before the Board on Friday, the 7th day of December, 2012, at 12:00 o'clock P M, prevailing local time. The address at which you are to appear is 1 Denver Federal Center Way, Building 20, Room A1419
Denver, CO 80225**

YOU ARE FURTHER COMMANDED to bring with you at that time and place written answers to the interrogatory requests described in the list attached to this subpoena that are or might be relevant to, or arise out of, the above referenced accident or incident. In lieu of personally appearing with the written answers, you can comply with this subpoena by causing the answers to the attached interrogatory requests to be delivered to the Board at the location stated above, no later than the date and time stated above.

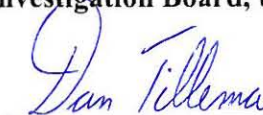
YOUR FAILURE TO RESPOND FULLY AND TRUTHFULLY TO THE REQUIREMENTS OF THIS SUBPOENA MAY RESULT IN THE ISSUANCE OF AN APPROPRIATE ORDER OF A JUDGE OR MAGISTRATE JUDGE OF A UNITED STATES DISTRICT COURT, WHICH MAY INCLUDE AN ORDER TO ENFORCE AND/OR OTHER SANCTIONS.

YOU ARE FURTHER ADVISED THAT MAKING FALSE OR FRAUDULENT STATEMENTS OR REPRESENTATIONS TO THE BOARD, ITS DESIGNEE(S) OR EMPLOYEE(S) OR KNOWINGLY DELIBERATELY WITHHOLDING OR DESTROYING RELEVANT EVIDENCE MAY SUBJECT YOU TO CRIMINAL PENALTIES UNDER 18 U.S.C. § 1001, AND OTHER LAWS OF THE UNITED STATES OF AMERICA.

Questions concerning this subpoena should be directed to the Issuer whose name and telephone number is given below.

Requester: Dan Tillema Telephone No: (202) 407-5176
Address: 1 Denver Federal Center Way
Building 20, Room A1419
Denver, CO 80225

THIS SUBPOENA is issued by Dan Tillema by authority of the U.S. Chemical Safety and Hazard Investigation Board, this 14TH day of Nov, 2012.



Issuer

RETURN OF SERVICE

I, the undersigned _____, hereby affirm under the penalties of perjury that I delivered a true copy of the foregoing subpoena to _____, the person named herein, or to _____, this _____ day of _____, 20____. I am over the age of 18 years, my business address is _____, and my telephone number is _____.

GIVEN under my hand and Seal this _____ day of _____, 20____.

Server

Case Name:	Chevron Richmond Refinery	To:	Chevron U.S.A. Inc.
Case No.:	2012-03-I-CA	Serve:	Mark L Farley, Partner, Pillsbury Winthrop Sha

Instructions:

Each interrogatory must be answered separately and fully in writing under oath, unless it is objected to on the grounds that the information sought is outside the scope of the investigation or that the respondent is privileged to refuse to answer the particular interrogatory. For these allowable objections, the respondent must state briefly in writing the precise grounds for the objection in relation to the particular interrogatory objected to. The interrogatory must otherwise be answered to the extent it is not subject to one of these allowable objections. See generally, 40 C.F.R. § 1610.1(a)(1).

Subpoena Interrogatory No.	Request Detail
N/A	See Attachment 1 - Interrogatories

Attachment 1 - Interrogatories

Subpoena Request	Description
CUSA-3SUBINT01	Describe the basis for the decision to upgrade the 4 Sidecut piping to 9 Chrome Alloy rather than a 300 series stainless steel which API 939-C and Chevron documents indicates as being capable of virtually eliminating sulfidation corrosion.
CUSA-3SUBINT02	Describe the details of the enhanced inspection program Chevron is implementing to prevent future failure due to sulfidation.
CUSA-3SUBINT03	Describe the knowledge Chevron has of the BP Cherry Point sulfidation failure on February 17, 2012 and whether or not that information was utilized in making the decision to upgrade the 4 Sidecut piping to a 9 Chrome alloy.
CUSA-3SUBINT04	Describe the basis for the decision to replace the #4 Sidecut piping at El Segundo following the August 6, 2012 incident at the Richmond refinery. Include the basis for the material of construction for the replacement piping and what if any additional enhancements were made.
CUSA-3SUBINT05	List any and all piping circuits that have been identified for replacement under the enhanced sulfidation inspection program throughout Chevron and describe how the enhanced inspection identified the need for replacement. Describe the plan that will be utilized after the piping is replaced to identify the metallurgical causes to further understand and prevent future sulfidation failures.
CUSA-3SUBINT06	Describe the reasons for not utilizing 300 series stainless steels to prevent future sulfidation corrosion in Chevron piping circuits such as the 4 Sidecut piping at the Richmond facility.