

August 17, 2026

Mary Zanter
Pipeline Safety Program Manager
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

Subject: Response to Notice of Probable Violation

Dear Mary Zanter:

Chevron Athena RNG, LLC acknowledges the violation identified under 49 CFR §192.731 and agrees to the proposed civil penalty set forth in the Notice of Probable Violation. Subject to Commission approval, Chevron will remit payment of the assessed penalty in accordance with the South Dakota Public Utilities Commission's instructions and applicable requirements.

Chevron appreciates the South Dakota Public Utilities Commission Staff's review and recognizes that the compressor inspection and testing requirements, as well as completion of compressor station procedures, were not addressed within the required timeframe. Chevron is committed to strengthening its compliance processes to prevent recurrence of similar findings.

To address the underlying causes and ensure continued compliance moving forward, Chevron has implemented the following actions:

1. Annual O&M Manual Review Program

Chevron will conduct a comprehensive annual review of its Operations and Maintenance (O&M) Manual to verify continued compliance with applicable federal and state pipeline safety regulations and to ensure procedures remain current and accurate.

2. Work Order Tracking and Automated Reminders

For Chevron-operated facilities, the annual O&M Manual review process will be tracked within Chevron's Aetos work order management system. Aetos will generate automated reminders to ensure reviews are completed on schedule and documented appropriately.

3. Documentation of Manual Reviews and Revisions

Completion of each annual O&M Manual review will be documented within the Aetos system. In addition, the review will be recorded on Form 2 of the O&M Manual, which will serve as a revision and change-tracking record documenting any updates or modifications resulting from the review process.

4. **Operations and Maintenance Responsibility**

Effective immediately, Everline will be responsible for the relief valve inspections at Full Circle. This change is intended to provide dedicated oversight and ensure ongoing compliance with compressor inspection, maintenance, and procedural requirements.

5. **Maintenance Management System**

Everline utilizes the Safe Pipe maintenance management system to schedule, track, and document maintenance and inspection activities. The system provides tracking of required maintenance tasks and supports timely completion of compliance-related activities.

Chevron remains committed to operating its facilities safely and in compliance with all applicable pipeline safety requirements. We believe the actions described above will provide additional controls, documentation, and oversight necessary to ensure continued compliance.

Please contact us if additional information is required.

Sincerely,

Sebastian De La Rosa

Sebastian De La Rosa

Operations & Maintenance Manager, RNG

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