

**Inland Corporation**  
**Accounting Policies and Procedures**  
**January 1, 2020**

**Section 1: Transit Variation Policy**

During the course of normal operations, Inland Corporation “Carrier” may over deliver or under deliver products versus what is received into the system. Positive transit variations (over deliveries) will result in charges to the Shipper and negative transit variations (under deliveries) will result in credits to the Shipper. Transit variations will be accounted for on a monthly basis and the calculation method is described below. Settlement prices are determined by the carrier and will consider product value, location, and pipeline operation.

**Transit Variation Volume Calculation**

A Shipper’s beginning/ending inventories at the open/close of the month, receipts and deliveries on the Inland system will be aggregated by product to calculate total transit variation. Transit variation will not be considered for “transfer movements” which are defined as only utilizing one meter for receipt and delivery ticketing.

For each system the transit variation will be calculated as the following for each product:

$$\text{Transit Variation} = (\text{Ending Inventory} + \text{Deliveries}) - (\text{Beginning Inventory} + \text{Receipts})$$

The transit variations for each product will be summed to create the Total Transit Variation (Over/Short). See the example below (all amounts in barrels):

| <b>Product</b> | <b>Begin-Inv</b> | <b>Receipts</b> | <b>Deliveries</b> | <b>End-Inv</b> | <b>Over/(Short)</b> |
|----------------|------------------|-----------------|-------------------|----------------|---------------------|
| 15MV2          | 0                | 10,000          | 9,400             | 500            | -100                |
| 91CB23         | 0                | 20,000          | 19,700            | 0              | -300                |
| S83CB23        | 1,000            | 10,000          | 11,200            | 0              | 200                 |
| TRNSMX         | 0                | 0               | 100               | 0              | 100                 |
| <b>Total</b>   | <b>1,000</b>     | <b>40,000</b>   | <b>40,400</b>     | <b>500</b>     | <b>-100</b>         |

**Settlement Price Determination**

Each product shipped will be assessed by the Carrier and will be assigned a value which the Carrier deems representative of the market value of the product, and accounts for normal pipeline operations. The Settlement Price will be the arithmetic monthly average of the low daily quotation of the postings listed in Table A rounded to the fourth decimal place. If a product is not listed below, Carrier will assess and assign a value at its sole discretion.

**Table A-Settlement Price Basis:**

| <b>Product Description</b> | <b>Product Code</b>   | <b>Price Marker</b>   |
|----------------------------|-----------------------|---|
| Diesel                     | 15EXP2/15HO2/15MV2    | Argus Diesel ULSD Buckeye pipe fob prompt Prmpt                   |
| Kerosene                   | 15MV1                 | Argus Kerosene Buckeye pipe fob prompt Prmpt                      |
| Jet Fuel                   | JETA/JETAFTZ          | Argus Jet fuel Buckeye pipe fob Prmpt                             |
| High Sulfur Heating Oils   | 500HO2/400AV1K/HSUN2D | Argus Heating oil 500ppm Buckeye pipe fob prompt Prmpt            |
| Generated Transmix         | TRNSMX                | Weighted Average Value of Products Received & Beginning Inventory |
| Received Transmix          | STMIX                 | Hudson Transmix Settlement Price                                  |
| Regular Gasolines          | S83CB/83RB/87CF       | Low of 7.8, 9.0, Winter: Argus Gasoline reg CBOB Buckeye          |
| Premium Gasolines          | 91CB/91RB/93CB        | Low of 7.8, 9.0, Winter: Argus Gasoline prem CBOB Buckeye         |
| Naphtha                    | NAPH                  | Low of 7.8, 9.0, Winter: Argus Gasoline reg CBOB Buckeye          |
| Butanes                    | MIXBUT/ISO/BBUTY      | Low of Platt's Mont Belvieu TET/NON-TET Normal Butane             |
| Propane/Propylene          | PROP/PRPL             | Low of 7.8, 9.0, Winter: Argus Gasoline reg CBOB Buckeye          |

**Settlement Charge/Credit Calculation**

For each Shipper in a subsystem, the Carrier will calculate a settlement charge/credit for each Shipper's total transit variation in the subsystem. The settlement charge/credit will be calculated by multiplying the total transit variation by the weighted average settlement price for each Shipper. The weighted average settlement price will be calculated from the Settlement Prices listed in Table A and the sum of Receipts and Beginning Inventory. The example below details the calculation of the settlement charge/credit.

| <b>Product</b> | <b>Sum of Receipts, Begin-Inv</b> | <b>Settlement Price</b> | <b>Over/Short</b> | <b>Settlement Charge</b> |
|----------------|-----------------------------------|-------------------------|-------------------|--------------------------|
| 15MV2          | 10,000                            | \$76.2978               | -100              |                          |
| 91CB23         | 20,000                            | \$75.6454               | -300              |                          |
| S83CB23        | 11,000                            | \$80.7213               | 200               |                          |
| TRNSMX         |                                   |                         | 100               |                          |
| <b>Total</b>   | <b>41,000</b>                     | <b>77.1663</b>          | <b>-100</b>       | <b>\$ (7,717)</b>        |

In the example above, the Shipper would be credited a settlement of \$7,717 for the loss of product.

Settlement charges/credits will be included in a Shipper's monthly invoice. If transit variation can be readily attributed to specific batches from a Shipper, or which can be attributed to discrete actions taken by the Shipper, the Shipper will be responsible for any expenses associated with the variation.

To recover its costs, Carrier will be charging Shippers a per barrel fee equal to the historical annual losses divided by the historical total volume.

As of February 1, 2015, the fee will be 1.0 cents/barrel calculated using the method above.

## **Section 2: Transmix Allocation Procedure**

### **Allocation of Transmix Generated on Pipeline Segments**

During the course of normal operations an interface (i.e. “transmix”) between batches of dissimilar products is created. In order to protect product integrity upon receipt and delivery into and out of each pipeline segment, it is often necessary for the Carrier to separate the interface from the adjacent batches. The volume of transmix generated between batches varies in volume and content depending upon the two products involved and their routing through the pipeline system. Routes through the pipeline system are defined by the pipeline segments used to move the products from their receipt point to their destination in the system. The pipeline segments move product from an origin or intermediate point to a destination or another intermediate point as defined by the Carrier.

For pipeline segments mentioned in the list of Points of Accumulation in the Inland system, the total Carrier inventory of transmix shall be held in Carrier’s custody for disposal for the account of the Shippers. Generally, transmix shall be allocated at the end of each month and the allocation procedure for transmix held in the Carrier’s custody is detailed in a later section. Transmix may be allocated directly to the Shipper for which the generation of the transmix can be readily attributed to specific batches from a Shipper, or to discrete actions taken by the Shipper. Transmix may also be allocated directly to the Shipper for shipments on pipeline segments not mentioned in the list of Points of Accumulation.

### **Points of Accumulation and Identification of Associated Delivering Line Segments**

Transmix collected at Fostoria (Point of Accumulation) is delivered on the following pipeline segments: (Cedar Point to Lima, and Lima to Fostoria).

Transmix collected at Hudson (Point of Accumulation) is delivered on the following pipeline segment: (Mogadore to Hudson).

### **Allocation and Settlement on Pipeline Segments**

At each Point of Accumulation of transmix listed above, the total Carrier inventory of transmix shall be held in Carrier’s custody for disposal for the account of the Shippers. The allocation of transmix to each Shipper shall be proportionate to the total barrels shipped that month on a delivering pipeline segment to each Point of Accumulation by each Shipper compared to the total volume shipped by all Shippers on that pipeline segment to that Point of Accumulation.

After the transmix is allocated, it may be sold on a bid or contractual basis by the Carrier for the account of Shippers, with each Shipper being credited with the sale proceeds corresponding to the

transmix settlement price for the relevant segment(s). The transmix settlement price will take into account the pipeline tariff to the transmix collection point on the relevant pipeline segment, the transportation to the transmix processor, the processing cost, local market adjustments, and other incremental expenses that may from time to time develop. The settlement price for each segment will be determined annually. Additionally the Shipper will be charged the pipeline tariff for the allocated transmix from the relevant origin to the Point of Accumulation.

For those pipeline segments allocated on a volumetric basis, and for pipeline segments for which the generation of the transmix can be readily attributed to specific batches from a Shipper, or which can be attributed to discrete actions taken by the Shipper, the Carrier may allocate the transmix directly to that Shipper.

**Transmix Settlement Price Calculation**

After the transmix is allocated, it may be sold on a bid or contractual basis by the Carrier for the account of Shippers, with each Shipper being credited with the sale proceeds corresponding to the transmix settlement price for the relevant segment(s). The transmix settlement price will be of the form:

$(A \times \text{CBOB gasoline price} + (1-A) \times \text{ULSD price}) - \text{the transmix adjustment};$

where A is the fraction of gas in the transmix pricing and 1-A is the fraction of diesel.

The transmix adjustment will take into account the transportation to the transmix processor, the processing cost, local market adjustments, and other incremental expenses that may from time to time develop.

| <b>Point of Accumulation</b> | <b>A</b> | <b>1-A</b> | <b>Transmix Adjustment (\$/barrel)</b> |
|------------------------------|----------|------------|--|
| Hudson                       | 0.46     | 0.54       | 13.34                                  |
| Fostoria                     | 0.35     | 0.65       | 8.13                                   |