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**ExxonMobil Pipeline Company**  
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**G. W. (Gary) Hartman**  
Manager  
Safety, Health And Environment Department



November 15, 2010

**Facsimile and UPS Overnight Delivery**

**Byron Coy**  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628

Re: South Portland Notice of Amendment CPF 1-2010-5010M.

Dear Mr. Coy:

On July 13, 2010 a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) inspected ExxonMobil Pipeline Company's (EMPCo) procedures in South Portland, Maine. During to the inspection the PHMSA Pipeline Inspector identified an inadequacy within EMPCo's procedures to monitor atmospheric corrosion control.

1. 195.583(b) *What must I do to monitor atmospheric corrosion control?*
- (b) *During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations and in spans over water.*

In response to this NOA, EMPCo has chosen to Not Contest this Notice and has modified the current Atmospheric Corrosion Inspection Program to include the following statement under the *Types of Facilities to be Inspected under this Program* section:

**Valves and Associated Piping**

- Aboveground
- In vaults

***NOTE - When inspecting valves and associated piping in a vault, the valves and piping must be inspected around their entire circumference. The piping-vault interfaces must also be inspected. In many cases, confined space entry will be necessary to conduct an inspection. If a vault is holding water, the water must be removed to allow for thorough inspection. Inspections may NOT be performed from the surface.***

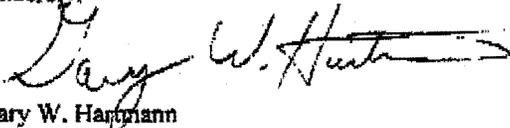
The intent of this letter is to provide a detailed response to the assertion of inadequate procedures without the need of a formal hearing. However, if a solution to this matter cannot be agreed upon based on the information provided in this correspondence, EMPCo reserves the right to request a formal hearing on all

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issues outlined in the Notice, at which time EMPCo would be represented by counsel. Please confirm whether this response is satisfactory to address the referenced Notice of Amendment (CPF 1-2010-5010M).

Please contact Kirwin L Yates at (225) 324-3055 or [kirwin.l.yates@exxonmobil.com](mailto:kirwin.l.yates@exxonmobil.com) for any additional questions.

Sincerely,



Gary W. Hargmann

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cc:  
SSH&E Files

bcc:  
J. E. James  
T.E. Long  
G.W. Hartmann  
J.D. Jones  
K. L. Yates