



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh St., S.W
Washington, D.C. 20590

DEC 31 2002

Mr. Andrew K. Turner
Vice President
ExxonMobil Pipeline Company
600 Bell Street
Houston, TX 77002

Re: CPF No. 3-2002-5004M

Dear Mr. Turner:

Enclosed is the Order Directing Amendment issued by the Associate Administrator for Pipeline Safety in the above-referenced case. It makes a finding of inadequate procedures and requires that you amend your integrity management program procedures. When the terms of the Order are completed, as determined by the Director, Central Region, OPS, this enforcement action will be closed. Your receipt of the Order Directing Amendment constitutes service of that document under 49 C.F.R. § 190.5.

Sincerely,

for 

Gwendolyn M. Hill
Pipeline Compliance Registry
Office of Pipeline Safety

Enclosure

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, DC 20590

In the Matter of)
)
ExxonMobil Pipeline Company,)
)
Respondent.)
_____)

CPF No. 3-2002-5004M

ORDER DIRECTING AMENDMENT

During January 17-18 and March 19-20, 2002, representatives of the Central and Southern Regions, Office of Pipeline Safety (OPS), inspected ExxonMobil Pipeline Company's (Respondent) integrity management program at Respondent's facility in Houston, Texas. As a result of the inspection, the Central Regional Director, OPS, issued to Respondent, by letter dated April 16, 2002, a Notice of Amendment (NOA). The NOA alleged inadequacies in Respondent's integrity management program and proposed to require amendment of Respondent's procedures to comply with the requirements of 49 C.F.R. § 195.452(b).

Respondent responded to the NOA by letter dated May 17, 2002. Respondent did not contest the allegations set forth in the NOA but requested a hearing to discuss the revisions Respondent planned to make to address the cited inadequacies. An informal hearing by telephone was held on June 19, 2002. Respondent submitted further information on its segment identification procedures by letters dated July 8 and July 31, 2002.

FINDING

The NOA alleged that Respondent's segment identification procedures did not consider spill migration via overland transports and transport by streams that run parallel to pipeline segments. The NOA further alleged that the procedures did not provide adequate justification for using a buffer zone applicable for crude and product spills to segments transporting highly volatile liquids (HVL).

In its May 17 response Respondent explained that it had identified the need for conducting overland spill analyses and HVL modeling. Respondent further explained that it was going to incorporate a topographic analysis of potential spill migration patterns, adjust the spill depth used in the model, include parallel streams in the analysis and use HVL modeling to determine vapor dispersion distances.

During the hearing, Respondent discussed in more detail the planned revisions to its segment identification procedures. OPS requested clarification on Respondent's HVL vapor cloud dispersion modeling and quality assurance process. In its July 8 letter, Respondent provided OPS with this information.

In its July 31 letter, Respondent submitted revised segment identification procedures for its integrity management program. Respondent explained that the revised procedures include improvements to address the inadequacies cited in the NOA as well as others Respondent identified. The Central Region reviewed the revised procedures.

Respondent has made substantial progress in revising its procedures. However, the procedures need to contain detailed information detailing who has responsibility for each step of the process, how each step will be carried out and when each step is to be done. For example, in the revised paragraph on parallel waterways, the procedure does not indicate who is responsible for determining the lengths of pipe that have the potential to affect a high consequence area, when this should be done, and what is to be done once determined. Similarly, the section on HVLs does not detail who is responsible for performing the calculations, how the modeling will be carried out, and what is to be done once the affected areas are identified.

Accordingly, I find that Respondent's integrity management program procedures are inadequate to ensure safe operation of its pipeline system. Pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237, Respondent is ordered to make the following changes to its integrity management program procedures. Respondent must -

1. Amend the procedures for identifying segments that could affect a high consequence area to include a detailed process that assigns roles and responsibilities, defines inputs and sources to be used, provides analytical steps personnel must follow to ensure a repeatable logical process, and transforms inputs and assumptions into outputs. In the procedures, Respondent must define the outputs so that they lead to conclusions or decisions. And Respondent must integrate the results of the segment identification determination back into the risk analysis process to better understand the consequences of a failure and the relative importance of the segment for establishing integrity assessment priorities.
2. Submit the amended procedures to the Regional Director, Central Region, OPS within 30 days after receipt of this Order Directing Amendment.
3. With the revised procedures, submit an implementation schedule for completing the identification process based on the revisions.
4. The Regional Director may extend the period for complying with the required items if the Respondent requests an extension and justifies the reasons for the extension.

The terms and conditions of this Order Directing Amendment are effective upon receipt.

Failure to comply with this Order may result in the assessment of civil penalties of up to \$25,000 per violation per day, or in the referral of the case for judicial enforcement.



Stacey Gerard
Associate Administrator
for Pipeline Safety

DEC 31 2002

Date Issued