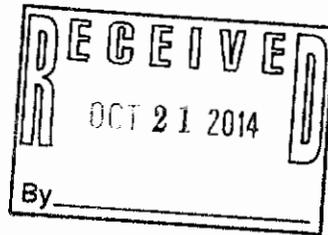


**ExxonMobil Pipeline Company**

800 Bell Street, Room #603B  
Houston, Texas 77002  
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**Jim B. Rose**

Safety, Health And Environment Department  
Manager

**ExxonMobil**  
*Pipeline*

October 17, 2014

Mr. Rodrick M. Seeley  
Director, PHMSA Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 S. Gessner Road, Suite 1110  
Houston, TX 77074

Re: CPF 4-2014-5020  
Notice of Proposed Violation – PHMSA Control Room Management Inspection - Pasadena

Dear Mr. Seeley:

During the week of May 5, 2014 PHMSA representatives inspected ExxonMobil Pipeline Company's ("EMPCo") procedures for Control Room Management (CRM) in Pasadena, Texas. The inspection resulted in a NOPV, CPF 5-2014-5020, being issued to EMPCo on September 9, 2014, which included a Proposed Compliance Order. Based upon the circumstances and supporting documentation, PHMSA did not propose a civil penalty associated with this matter. PHMSA sent the NOPV to Mr. Geoffrey Craft, who no longer works for EMPCo and is no longer the EMPCo Vice President. EMPCo ultimately received the NOPV from Mr. Craft on September 17, 2014. Going forward, please send all correspondence on this matter to:

Ms. Karen Tyrone  
EMPCo Vice President and Operations Manager  
800 Bell Street, Room 691H  
Houston, Texas 77002

ExxonMobil Pipeline Company strives to maintain compliance with all regulations, and any allegations of noncompliant or inadequate procedures are taken very seriously. Please let this letter serve as EMPCo's response to PHMSA's concerns as noted in the September 9, 2014 letter. In submitting this response, EMPCo neither admits nor denies the factual and legal allegations contained in the NOPV.

For ease of reference, we have included the language (and retained the numbering) from PHMSA's September 9, 2014 letter, which appears in italicized text below. EMPCo's response immediately follows each item in normal font.

**1.) 195.446 Control Room Management**

**(h) Training. Each operator must establish a controller training program and review the training program content to identify potential improvements at least once each calendar year, but at intervals not to exceed 15 months. An operator's program must provide for training each controller to carry out the roles and responsibilities defined by the operator. In addition, the training program must include the following elements:**

**(2) Use of a computerized simulator or non-computerized (tabletop) method for training controllers to recognize abnormal operating conditions; controller's prompt and appropriate response to operating conditions, an operator must define each of the following:**

Cited Violation:

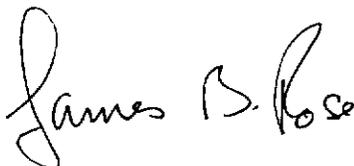
EMPCo failed to conduct simulator or tabletop exercises for the purpose of training Pasadena Station Operators (PSO), controllers on how to recognize and respond to abnormal operating conditions (AOC). During the inspection EMPCo had no record and representatives had no recollection of a simulator or tabletop exercise being provided to controllers at the Pasadena Station facility for training on how to recognize and respond to AOCs.

EMPCo Response:

Included in PHMSA's NOPV was a Proposed Compliance Order, which required the following: 1) EMPCo shall include in its controller training program, the instruction and recording of simulator or tabletop exercises for the purpose of training Pasadena Station Operators on how to recognize and respond to AOCs; 2) EMPCo shall develop and implement a program to train the Pasadena Station Operators to recognize and respond to AOCs, and submit a copy of the program to PHMSA for review; 3) complete item 1 within 90 days of receipt of a Final Order; and 4) documentation of costs associated with fulfilling the Compliance Order.

EMPCo maintains that the Pasadena Station Operators receive training on how to recognize and respond to AOCs during their initial on-the-job training period as well as documented Supervisor reviews. The training format is not structured as a formal tabletop or simulator, but rather as one-on-one training with an experienced operator or a review meeting with a Supervisor to evaluate the trainee's competency. To address this NOPV and Proposed Compliance Order, EMPCo will train the PSOs and Relief PSOs on a simulator located in EMPCo's Operations Control Center (OCC). EMPCo plans to complete this training by December 16, 2014. A copy of the program will be submitted in accordance with the NOPV deadline (due within 90 days of Final Order), and costs will be documented to the extent practical.

Sincerely,



Jim B. Rose  
Manager, Safety Health and Environment