

ExxonMobil Production Company
CORP-MI-3008
P.O. Box 4358
Houston, Texas 77210-4358



March 13, 2012

Response to Warning Letter
Reference Number CPF 2-2012-2001W

Wayne T. Lemoi
Director, Office of Pipeline Safety
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration (PHMSA)
Southern Region
233 Peachtree Street NE, Suite 600
Atlanta, GA 30303

Dear Mr. Lemoi:

ExxonMobil Production Company ("ExxonMobil") is respectfully responding to the Warning Letter Reference CPF 2-2012-2001W issued by your office on February 9, 2012.

The following summarizes the findings associated with the PHMSA inspection of our Mobile Bay office and its offshore pipeline facilities from November 7th to 10th, 2011:

1. Valve maintenance records for pipeline MO-31-G indicate that the annual inspection was not completed after December 2008.
2. Internal Corrosion Control Monitoring records for pipeline MO-31-G indicate that the semi-annual inspection was not completed after December 2008.

In early 2009, MO-31G was reclassified as a gas gathering pipeline per Docket No. PHMSA—1998—4868; Amendment 192-102 "Gas Gathering Line Definition; Alternative Definition for Onshore Lines and New Safety Standards." The pipeline was then removed from the integrity management program and associated inspections were ceased. The subject pipeline has been returned to the inspection program for valve maintenance and internal corrosion control monitoring.

Our local field management and associated personnel have reviewed the inspection results and our integrity management programs to reinforce the importance of maintaining inspection protocols and ensuring that proper documentation is completed.

A Division of Exxon Mobil Corporation

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Should additional information be required, please contact Alfred J. Sly at 281-654-5947 or via email at alfred.j.sly@exxonmobil.com.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Baird", written over the printed name.

Jennifer W. Baird
U. S. Production
Regulatory Compliance Supervisor

JWB/ajs

c:

Doug Frost
Russ Spahr, XOM – Mobile Bay
Lance Williams, XOM – Mobile Bay