

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



March 13, 2012

Response to Notice of Amendment
Reference Number CPF 2-2012-2002M

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 30303-1501

Dear Mr. Lemoi:

ExxonMobil Production Company ("ExxonMobil") is respectfully responding to the Notice of Amendment Letter Reference CPF 2-2012-2002M issued by your office on February 9, 2012.

The following summarizes the suggested amendments to the Operations, Maintenance and Emergency Manual (OM&E Manual) as identified during the PHMSA inspection of our Mobile Bay office and its offshore pipeline facilities from November 7th to 10th, 2011:

1. Inconsistent definition of an *incident* as described in section 2.3.6.2 of the Core OM&E Natural Gas DOT Manual and §191.3(1ii and 1iii).
2. Absent written procedures for electronic PHMSA notification as outlined in §191.22.
3. Insufficient procedures for leak indications and survey methodologies as applicable to offshore pipelines.

In review of the §191.3 Definitions, our Core OM&E Natural Gas Manual have been updated to correctly reflect the definitions as prescribed in sub-paragraphs (1) (ii) "Estimated property damage of \$50,000 or more, including loss to the operator and others, or both, but excluding cost of gas lost" and (1) (iii) "Unintentional estimated gas loss of three million cubic feet or more."

Written procedures for electronic PHMSA notification has been added to our Core OM&E Natural Gas Manual. The provided events of §191.22 sub-paragraphs (1 and 2) will be utilized as triggers in our Electronic Management of Change process to ensure that the events are reported electronically through the National Registry of Pipeline and LNG Operators.

Written procedures for execution and documentation of the leak survey requirements have been added to our Core OM&E Natural Gas Manual. The process is currently being conducted at our offshore facilities by utilizing a flyover method looking for leakage, erosion of vegetation, potential physical damage, or other potential problems. The survey and results are executed and documented on a semi-monthly (every two weeks) basis.

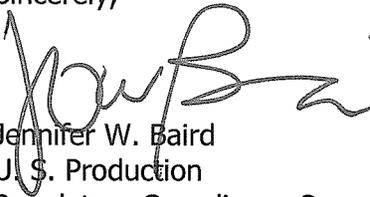
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As requested, the revised sections of our Core OM&E Manual are attached.

Our local field management and associated personnel have reviewed the PHMSA inspection results and our OM&E Manual to reinforce the applicability of our manuals to the 49 CFR 191 and 49 CFR 192 regulations.

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

Sincerely,



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

JWB/ajs

Attachments

c – w/attachments:

Doug Frost – Houston
Russ Spahr – Mobile Bay
Lance Williams – Mobile Bay