

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 24, 2009

Mr. Patrick T. Doolan, Vice President  
Southern Operations Manager  
ExxonMobil Pipeline Company  
800 Bell Street  
PL-EMB-691H  
Houston, TX 77002

**CPF 3-2009-5024W**

Dear Mr. Doolan:

On November 21, 2008, and December 1-3, 2008, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your ExxonMobil Pipeline Company 30-inch diameter Mokena to Joliet refinery crude oil pipeline, the Lockport, IL refined products terminal and pipeline records, and the field facilities in Patoka and Lockport, Illinois.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

**1. §195.404 Maps and Records.**

**(a) Each operator shall maintain current maps and records of its pipeline systems that include at least the following information;**

**(2) All crossings of public roads, railroads, rivers, buried utilities, and foreign pipelines.**

ExxonMobil Pipeline Company did not maintain current maps of its pipeline system. The 30-inch diameter crossing of the Alliance Pipeline east of the Joliet Refinery was not documented on maps at the last inspection in 2004. At that time, ExxonMobil indicated

that this crossing would be added to the map. During the 2008 inspection, the ExxonMobil maps were not updated or current as the crossing was only illustrated by a hand drawn redlined version of the Alliance crossing.

2. **§195.579 What must I do to mitigate internal corrosion?**

**(c) Removing pipe. Whenever you remove pipe from a pipeline, you must inspect the internal surface of the pipe for evidence of corrosion. If you find internal corrosion requiring corrective action under Sec. 195.585, you must investigate circumferentially and longitudinally beyond the removed pipe (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the removed pipe.**

ExxonMobil Pipeline Company did not perform two internal inspections of their pipeline system. During the 2008 inspection, ExxonMobil Pipeline records did not have information or documentation to support that an internal inspection was performed on the 12-inch diameter Buckeye (Badger) Pipeline discharge valve in June 2008 and the 16-inch diameter scraper trap valve in the Lockport, IL Terminal in July 2008 when the valves were removed from the system.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in ExxonMobil Pipeline Company being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 3-2009-5024W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

Ivan A. Huntoon  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration