

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 4, 2018

Geoffrey Craft
Vice President, Operations
ExxonMobil Pipeline Company
22777 Springwoods Village Parkway, E3.5A.385
Spring, Texas 77389

CPF 4-2018-5018W

Dear Mr. Craft:

On March 6, 2017 to July 14, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected your ExxonMobil Pipeline Company (EMPCo) procedures and records at the EMPCo campus in The Woodlands, TX, and pipeline facilities throughout Texas and Louisiana.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violation is:

1. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

§ 195.420 Valve Maintenance.

(a) Each operator shall maintain each valve that is necessary for the safe operation of its pipeline systems in good working order at all times.

EMPCo failed to follow their written maintenance procedure, PL731A DOT Mainline Valve Inspection and Maintenance. The procedure states, “A full valve closure of 100% is recommended, but is not required to meet DOT requirements, however the valve MUST be operated a minimum of 15%” for motor operated and manual operated valves. EMPCo did not partially operate each valve as required by their written procedure.

During the valve maintenance records inspection of EMPCo facilities in the states of Texas, and Louisiana, EMPCo provided records documenting DOT/Mainline valve inspections. The records showed the inspections for the years between 2014 and 2017, indicate they failed to perform the partial operation of four valves during the valve inspections.

Valve	Date of Inspection	Percentage Operated
VLV 17510-6093	July 28, 2015	0%
	January 28, 2016	0%
MOV-C917328-8579	March 31, 2017	0%
ESDV-17105-2338	March 19, 2014	0%
	September 26, 2014	0%
	March 13, 2015	0%
	October 1, 2015	0%
	March 4, 2016	0%
	September 2, 2016	0%
ESDV-17109-2333	March 19, 2014	0%
	March 13, 2015	0%
	October 2, 2015	0%
	March 4, 2016	0%

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists, up to a maximum of \$2,090,022 for a related series of violations. For violations occurring prior to November 2, 2015, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a 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 EMPCo 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 4-2018-5018W**. 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,

Mary L. McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration