



SENT VIA ELECTRONIC MAIL – RETURN RECEIPT REQUESTED

July 15, 2021

Mary L. McDaniel - Director, Southwest Region
Office of Pipeline Safety, PHMSA
8701 South Gessner Road Suite 630, Houston, Texas 77074

Re: ExxonMobil Pipeline Company Response to CPF 4-2021-028-NOA

Dear Ms. McDaniel:

ExxonMobil Pipeline Company (“EMPCo”), on behalf of itself, Mobil Pipeline Company, and Mustang Pipeline LLC, submits written comments below in response to the above-captioned Notice of Amendment (“NOA”) pursuant to 49 C.F.R. § 190.206 (the “Written Response”). The NOA was issued by the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) and received by EMPCo on May 4, 2021. The NOA relates to alleged inadequacies of EMPCo’s plans and procedures for EMPCo’s Central Inspection System, operating under Mobil Pipeline Company, ExxonMobil Pipeline Company, and Mustang Pipeline LLC, located in and around Lockport, Illinois, as a result of an inspection that occurred from June 15, 2020, through October 30, 2020.

EMPCo requested an extension of time to respond to the NOA via email dated May 24, 2021. By email dated May 26, 2021, PHMSA granted an extension of the response deadline to July 17, 2021. This Written Response is therefore timely.

EMPCo strives to maintain compliance with all regulations. Allegations of inadequate plans or procedures are taken very seriously. In this Written Response, EMPCo is providing a narrative explanation of its position and, where necessary, its proposed changes to its plans and procedures, in order to address the issues raised in the NOA. PHMSA’s allegations appear in bolded text, with EMPCo’s narrative response to each immediately following.

Item 1- ExxonMobil Pipeline's written *DOT Liquids Manual, Section 5. Analyzing Pipeline Accidents - 195.402(c)(5) (Issued October 2002, Reviewed October 16, 2019)* is inadequate to assure safe operation of its pipeline facilities because it does not include a process for analyzing pipeline accidents to determine their causes as required by § 195.402(c)(5). PHMSA reviewed *Section 5. Analyzing Pipeline Accidents – 195.402(c)(5)* and found the procedure does not include detailed analysis techniques or methods to analyze pipeline accidents to determine the root cause of an accident and does not include measures to prevent recurrence of an accident.

ExxonMobil Pipeline must amend *Section 5 of its DOT Liquids Manual* to include a process for analyzing pipeline accidents to determine their causes, along with the timeframe for when the root cause analysis will be conducted. Additionally, the procedures must be revised to include the identification of which measures should be implemented to prevent a recurrence and the timeframe for the completion of those identified measures.

EMPCo Response - EMPCo uses the Incident Notification Investigation and Sharing Guide (INIS) to investigate, determine the cause of, communicate and prevent the recurrence of accidents. The INIS includes detailed procedures and processes for notification protocols, incident categorization, performing investigations to determine root causes, the sharing of incidents to prevent reoccurrence and documenting investigations in a timely manner.

EMPCo has updated its procedure in the DOT Liquids Manual, Section 5. Analyzing Pipeline Accidents - 195.402(c)(5) to include additional language referencing the INIS. An excerpt from the DOT Liquids Manual, Section 5 is attached hereto as Exhibit A, with the additional language highlighted.

For detailed guidance on analyzing pipeline accidents, their causes, and associated timeframes please refer to EMPCo's INIS specifically section 7.1 and diagram 2. An excerpt from the INIS is attached hereto as Exhibit B.

In addition, EMPCo in 2021 is in the process of reviewing and amending the INIS Guide, and as part of this process, EMPCo will add additional language clarifying expected timeframes for analyzing pipeline accidents. The INIS Guide review and update is scheduled to be completed by October 1, 2021. An excerpt from the INIS showing the timeframe language is attached hereto as Exhibit C.

Item 2 - ExxonMobil Pipeline's *Integrity Management Program Manual, Section 6.1 EFRD Evaluation (Dated April 2020, Version 2020.1)* is inadequate to assure safe operation of its pipeline facilities because it fails to set forth a process for documenting the determination for installation of and justification for not installing emergency flow restricting devices (EFRD). PHMSA reviewed Section 6.1 and found the procedure for determining whether to install an EFRD does not include guidance for documenting the company's decision-making process and does not provide justification of what is considered *significant*.

ExxonMobil Pipeline must amend its *Integrity Management Program Manual, Section 6.1 EFRD Evaluation*, to include detailed guidance regarding documenting the determination for installation of and the justification for not installing EFRDs, as well as include guidance for what is considered *significant* in the making that determination.

EMPCo Response - EMPCo will amend Section 6.3¹ of its Integrity Management Program Manual to provide detailed guidance regarding documenting the determination for installation of and the justification for not installing EFRDs, as well as include guidance for what is considered

¹ Please note that we believe PHMSA intended to reference Section 6.3 as opposed Section 6.1.

significant in the making that determination. EMPCo respectfully requests that it be given until September 1, 2021, to make these amendments, and EMPCo will provide the amended Section to PHMSA by that date.

Please note that Exhibit A, Exhibit B, and Exhibit C contain proprietary confidential commercial information that EMPCo keeps private, and same are submitted to PHMSA in expectation of protection from disclosure pursuant to 5 U.S.C. § 552(b)(4) and/or the Critical Infrastructure Information Act of 2002. If any or all documents, including the attached Exhibits, become subject to a FOIA request in the future, EMPCo respectfully requests that PHMSA notify EMPCo and follow the agency's procedures pursuant to 49 C.F.R. § 7.23.

Should you have any questions or require any additional information in regards to the responses above, please contact Caroline Henderson at 832-624-7920 or pipeline.safety.compliance@exxonmobil.com.

Sincerely,



Steven A. Yatauro