



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

12300 W Dakota Ave , Suite 110  
Lakewood, CO 80228

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 9, 2007

Mr. John DuPre  
Vice President – Operations, Northern  
ExxonMobil Pipeline Company  
3225 Gallows Road  
Fairfax, VA 22037

SENT TO COMPLIANCE REGISTRY  
Hardcopy  Electronically   
# of Copies 1 / Date 1/9/07

CPF 5-2007-5001W

Dear Mr. DuPre:

On June 20 to June 22, 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your Silvertip Pipeline in south central Montana.

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. §195.402 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 commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

ExxonMobil Pipeline Company's (EMPCo's) cathodic protection monitoring procedures state "The annual pipe-to-soils shall be plotted and compared to the last three years. When a significant drop in potential is noted, further investigation should be scheduled to identify the cause." Review of EMPCo's pipe-to-soil records for the Silvertip Pipeline in 2005 show that several locations along this pipeline had pipe-to-soil readings significantly below the previous

three years' readings. In fact several locations show a trend toward lower levels of cathodic protection. There had been no further investigation to determine the cause.

**2. §195.410 Line markers.**

**(a) Except as provided in paragraph (b) of this section, each operator shall place and maintain line markers over each buried pipeline in accordance with the following:**

**(1) Markers must be located at each public road crossing, at each railroad crossing, and in sufficient number along the remainder of each buried line so that its location is accurately known.**

At the time of this inspection there were no pipeline markers at the Peterson road crossing at MP 54.8.

**3. §195.422 Pipeline Repairs.**

**(a) Each operator shall, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property.**

EMPCo's in-service fillet and groove weld procedures, qualified in 1974, do not have the number and/or type of qualification destructive tests that are required under the accepted industry practice for qualifying in-service welds (API 1104 Appendix B).

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 violations 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. Be advised that 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 5-2007-5001W**.

Sincerely,



Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry  
PHP-500 (G. Davis # 116697)