



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

12300 W Dakota Ave , Suite 110
Lakewood, CO 80228

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 8, 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 2/9/07

CPF 5-2007-5005M

Dear Mr. DuPre:

From 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 procedures for Operations and Maintenance in Bridger, Montana.

As a result of the inspection, it appears that your written procedures are inadequate according to the requirements of §190.237:

1. §195.222 Welders: Qualification of welders.

(b) Welders may not weld with a particular welding process unless, within the preceding 6 calendar months, the welder has

(1) Engaged in welding with that process; and

(2) Had one weld tested and found acceptable under Section 9 of API 1104. Amdt 195-78 pub. 9/11/03, eff. 10/14/03.

ExxonMobil Pipeline Company's (EMPCo's) Pipeline Welding Manual procedures state that a welder may not weld with a particular welding process unless that welder has welded and had an acceptable NDT using that process within the previous 12 months. The correct time limitations must be incorporated.

2. §195.228 Welds and welding inspection: Standards of acceptability.

(b) The acceptability of a weld is determined according to the standards in Section 9 of API 1104. However, if a girth weld is unacceptable under those standards for a reason other than a crack, and if Appendix A to API 1104 (ibr, see § 195.3) applies to the weld, the acceptability of the weld may be determined under that appendix.

Nondestructive testing (NDT) procedures in EMPCo's DOT Liquids Manual reference 49 CFR Section 195.228 instead of referencing Section 9 of API 1104.

3. §195.434 Signs.

Each operator must maintain signs visible to the public around each pumping station and breakout tank area. Each sign must contain the name of the operator and a telephone number (including area code) where the operator can be reached at all times.

EMPCo's DOT Liquids Manual signage procedure only calls for signage around breakout tanks, meters, valves, and other critical locations, but not specifically pump stations.

4. §195.569 Do I have to examine exposed portions of buried pipelines?

Whenever you have knowledge that any portion of a buried pipeline is exposed, you must examine the exposed portion for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated. If you find external corrosion requiring corrective action under Sec. 195.585, you must investigate circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion.

EMPCo's DOT Liquids Manual Exposed Pipe procedures for the examination of exposed portions of pipelines do not reference the form that EMPCo employees use when implementing this function.

5. §195.573 What must I do to monitor external corrosion control?

(b) Unprotected pipe. You must reevaluate your unprotected buried or submerged pipe and cathodically protect the pipe in areas in which active corrosion is found, as follows:

(1) Determine the areas of active corrosion by electrical survey, or where an electrical survey is impractical, by other means that include review and analysis of leak repair and inspection records, corrosion monitoring records, exposed pipe inspection records, and the pipeline environment.

(2) For the period in the first column, the second column prescribes the frequency of evaluation.

<u>Period</u>	<u>Evaluation frequency</u>
Before December 29, 2003	At least once every 5 calendar years, but with intervals not exceeding 63 months
Beginning December 29, 2003	At least once every 3 calendar years, but with intervals not exceeding 39 months.

Though EMPCo's DOT Liquids Manual discusses the possibility that EMPCo may have bare pipe, corrosion procedures do not give guidance for cathodically protecting bare pipe.

Response to this Notice

If, after notice and opportunity for a hearing, your procedures are found to be inadequate, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237).

This letter serves as your notice of inadequate plans or procedures. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to the Notice of Amendment portion of this document and note the response options. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment.

If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In your correspondence on this matter, please refer to **CPF 5-2007-5005M** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



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

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*

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