

ExxonMobil Pipeline Company

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July 11, 2012

Byron Coy, PE,
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

Re: CPF 1-2012-5011M Notice of Amendment
Mobil Pipeline Company OP ID 12628

Dear Mr. Coy:

During the week of November 14, 2011, a representative of Pipeline and Hazardous Materials Safety Administration (PHMSA) inspected Mobil Pipeline Company's East Providence, RI to Springfield, MA 6" products pipeline. During the inspection, PHMSA identified inadequacies within ExxonMobil Pipeline Company's (EMPCo's) procedures for Operations and Maintenance (O&M). Pursuant to Chapter 601 of 49 United States Code, Notice of Amendment (NOA) CPF 4-2010-5018M, dated June 11, 2012, was issued to EMPCo.

In response to this NOA, EMPCo has chosen to Not Contest this Notice and has modified the Operations and Maintenance (EMPCo Hazardous Liquids Manual) to include the following:

• **NOA CPF 4-2010-5018M Item No.1**

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

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart R of this part.

ExxonMobil's DOT Liquid Manual and Cathodic Protection Program procedures were inadequate in that they failed to provide details on how supervisors maintain a thorough knowledge of that portion of the corrosion control procedures established under Sec.195.402(c)(3) for which they were responsible for insuring compliance, in accordance with 49 CFR 195.555.

To address the concern of how supervisors maintain a thorough knowledge of that portion of the corrosion control procedures, EMPCo has revised its DOT Liquids Manual to include the following:

Supervisors responsible for CP must maintain a thorough knowledge of that portion of the corrosion control procedures established under DOT 195.402(c)(3) - Liquids and DOT 192.605(b)(2) - Gas for which they are responsible for ensuring compliance per DOT 195.555 - Liquids and DOT 192.453 - Gas.

PROCEDURES:

Field Operations must verify that supervisors maintain a thorough knowledge of that portion of the corrosion control procedures for which they are responsible. Company supervisors responsible for corrosion control must have knowledge and understand the associated operating, maintenance, and repair procedures.

Supervisors responsible for Corrosion Control Procedures are assigned the EMPCo Supervisor Awareness Training - Fundamentals of Corrosion computer-based training (CBT) module. Verification of knowledge occurs annually through a multiple-choice test that must be taken with the CBT module. The CBT objective is to ensure supervisors understand corrosion control and how EMPCo complies with the DOT requirement. This course fulfills the requirement that supervisors maintain a thorough knowledge of corrosion control procedures for which they are responsible for ensuring compliance.

Please see the attached EMPCo Supervisor Awareness Training Fundamentals of Corrosion Annual Training Presentation and Exam (with correct answers).

- **NOA CPF 4-2010-5018M Item No.2**

- 2. *§195.402 Procedural manual for operations, maintenance, and emergencies*

- (c) *Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations*

- (3) *Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.*

ExxonMobil's procedure was inadequate in that it did not provide details on how to locate leads at intervals frequent enough to obtain electrical measurements indicating the adequacy of cathodic protection, in accordance with 49 CFR 195.567.

To address the concern of locating test leads at intervals frequent enough to determine adequacy of cathodic protection, EMPCo has revised the Facilities Inspection and Maintenance Management System (FIMMS) Cathodic Protection Manual to include the following:

Potentials should be obtained at all test points and documented accordingly. For the purposes of this document, test points are defined as locations where CP readings are taken. These locations may include test lead wires, aboveground valves, valves in vaults, and other contact points on the structure.

Test points must be located at sufficient intervals to determine the adequacy of CP. NACE SP0169-2007 Section 4.5.1 lists the following locations where test stations may be located - cased crossings, foreign metallic pipeline crossings, isolating joints, waterway crossings, bridge crossings, valves, galvanic anodes, road crossings, stray current areas, and rectifiers.

Additional information considered includes third party construction, Integrity Management Program assessments and close-interval survey data when available.

- **NOA CPF 4-2010-5018M Item No.3**

3. 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.

The operator's procedural manual for operations, maintenance and emergencies is inadequate in that some sections lacked revision dates that would ensure that the manual has been reviewed at intervals not exceeding 15 months, but at least once each calendar year and appropriate changes have been made as necessary to insure that the manual is effective.

To ensure that the manual has been reviewed at intervals not exceeding 15 months, EMPCo has revised the DOT Liquids Manual to include the following:

Regulations require that Operating Instructions and Emergency Manuals be reviewed annually not to exceed 15 months and that appropriate changes be made as necessary to ensure effectiveness. Materials incorporated by reference are to be reviewed and revised as needed. All such reviews and revisions are to be documented as a verification of compliance. To assure the O & M Manual is reviewed at intervals not exceeding 15 months, but at least once each calendar year, EMPCo has implemented an alert reminder within its Environmental Data Management System (EDMS). The EDMS process will generate a reminder to the Manual owner and the Manual owner's supervisor that a review of the O & M Manual is required. This reminder will stay active until the Manual is updated. When the Manual is updated, EDMS generates a notification to the Manual owner and Manual owner's supervisor that the Manual update is complete. EDMS notifications will help facilitate required completion of the O & M Manual reviews.

The intent of this letter is to provide a detailed response to the assertion of inadequate procedures without the need of a formal hearing. However, if a solution to this matter cannot be agreed upon based on the information provided in this correspondence, EMPCo reserves the right to request a formal hearing on all issues outlined in the Notice, at which time EMPCo would be represented by counsel. Please confirm whether this response is satisfactory to address the subject Notice of Amendment CPF 4-2012-5011M.

Please contact Kirwin L Yates at (225) 324-3055 or kirwin.l.yates@exxonmobil.com for any additional questions.

Sincerely,



G.W. (Gary) Hartmann
Safety, Health and Environment Department Manager