ExxonMobil Pipeline Company
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G.W. (Gary) Hartmann
Safety, Health And Environment Department
Manager

ExxonMobil Pipeline

February 2, 2010

Mr. Ivan A. Huntoon
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO. 64106-2641

Re: CPF 3-2009-5025
Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order

Dear Mr. Huntoon:

ExxonMobil Pipeline Company (EMPCo) on behalf of ExxonMobil Oil Corporation (EMOC) is responding to the Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order (Notice) resulting from a safety inspection at the Lockport Terminal, Lockport Illinois in December 2008.

Please address any future correspondence on this matter to:
Mr. Jimmie James
Northern Operations Manager
3225 Gallows Road, Room 5B2134
Fairfax, Virginia 22037

The Notice identified two instances of possible violations. The allegations are addressed in detail below, followed by EMPCo's response.

1.) 195.404 Maps and Records

(a) Each operator shall maintain current maps and records of its pipeline systems that include at least the following information

(3) The maximum operating pressure of each pipeline

PHMSA Allegation:
ExxonMobil Pipeline Company did not maintain current maps and records that would define the maximum operating pressure of each pipeline system. The 16 inch diameter pipeline within the Lockport, IL Terminal that feeds the Buckeye (West Shore) system does not have any maximum operating pressure (MOP) determination documentation. According to ExxonMobil personnel, this section of the pipeline within the terminal fence has been treated as in-plant piping and therefore not subject to the scrutiny of MOP documentation. In addition there were no pressure test records.

EMPCo Response
The line segment in question begins and ends inside the fence of the Lockport Terminal facility. In the past this line has been thought of as "In-Plant Piping" and as such excluded from PHMSA jurisdiction per 49CFR 195.1(b)(8). During the December 2008 inspection of the facility discussions about the line prompted EMPCo to reevaluate the service of this line segment and the appropriate application of the "In Plant Piping" exclusion.

Through an additional search of records ExxonMobil recently located hydrotest records for the 16 inch line segment from EMOC's booster pump to the West Shore Pipeline connection. Included with this submittal as Attachment "A" (WI223) is a copy of the hydrotest record and associated pressure and temperature charts. This record shows that on November 9, 1972 the piping in question was tested to a minimum test pressure of 395 psig for a total of 24 hours. Attachment "B" (WI240) shows a pressure test on EMOC's West Shore booster pump piping. The booster pump piping was tested to a minimum pressure of 409 psig for 24 hours but ANSI 150 flanges and valves limit the MOP to 275 psig. Product flows from EMOC's West Shore booster pump through the 16 inch pipe in question to the West Shore connection located at the fence line of EMOC property.

The 16 inch line segment in question normally operates at 125 psig, and overpressure protection shutdown switches are set at 200 psig.

EMPCo is submitting these records as documentation of maximum operating pressure for the line segment in question and asks PHMSA to rescind the Notice of Probable Violation and associated Civil Penalty.

2.) 195.404 Maps and Records

(b) Each operator shall maintain for at least 3 years of daily operating records the indicate-

(2) Any emergency or abnormal operation to which the procedures under 195.402 apply.

PHMSA Allegation:
ExxonMobil Pipeline Company did not maintain operating records of all abnormal operation on the incoming and outgoing pipelines, breakout tanks and facility piping at the Lockport IL Terminal as required by the code. Abnormal operations documented on the event log recorder have not been kept for the three years as required by the code. Records were available from November 2007 to December 2008. Abnormal operations records from December 2005 through October 2007 were not maintained for the pipeline.

EMPCo Response
EMPCo utilizes an "event logger" at the Lockport IL Terminal to record abnormal conditions on the incoming and outgoing pipelines and breakout tanks. This device produces a paper log of events at the facility. The "event logger" has been operational and functioning properly since December 2005. Unfortunately, during a cleanup effort at the terminal, the December 2005 through October 2007 records were discarded. Abnormal operations records were available from November 2007 through December 2008.

Terminal employees have received training reinforcing the importance of adhering to document retention requirements for regulatory compliance. Additionally, EMPCo is considering alternate

ways to electronically record operational data that would include abnormal operations. This would eliminate the need for maintaining and storing three years of worth of paper documents.

In light of EMPCo's process to record the required information and the corrective actions taken, EMPCo requests that PHMSA reconsider the Notice of Probable Violation and withdraw the associated Proposed Civil Penalty.

EMPCo takes regulatory compliance very seriously and is continuously reevaluating and improving its regulatory compliance methods and procedures. Consistent with this, please contact Thad Massengale, (713) 656-2258, with any questions or concerns regarding this issue.

Sincerely,

Attachments:

Attachment A – WI223 Mobil Refining Co. Lockport Terminal Hydrostatic Test
Attachment B – WI240 Mobil Oil Corporation, Lockport Terminal, Pressure Test

ATTACHMENT A

Mobil Refining Co.
Lockport Terminal
Hydrostatic Test

WI 223

December 14, 1972

SUBJECT: Mobil Refining Co.
Lockport Terminal
Hydrostatic Test

ENCLOSURES: Exhibit 1 - Certification of Pipe Line Hydrostatic Pressure Test

Exhibit 2 - Temperature Chart 11-9-72 to 11-10-72

Exhibit 3 - Pressure Chart 11-9-72 to 11-10-72

Exhibit 4 - Lockport Terminal Flow Diagram

DISCUSSION: During this test the ambient temperature decreased continuously resulting in a corresponding drop in test pressure. Exhibit 4 has been included to show what part of the tank farm was included in this test.

CONCLUSION: In reviewing the enclosed Exhibits this hydrostatic test is satisfactory.

E F Anderson

E. F. Anderson - P.E.-62-20802

CO 8482 (2-71)

CERTIFICATION OF PIPE LINE HYDROSTATIC PRESSURE TEST

EXHIBIT 1

CARRIER NAME Mobil Refining Co Lockport

TESTING COMPANY NAME Morrison Const Co

PRESSURE TEST No. WI 223 DATE 11-9-72

THIS IS TO CERTIFY THAT THE PIPE LINE OR PIPE LINE SECTION DESCRIBED BELOW WAS HYDROSTATICALLY PRESSURE TESTED IN ACCORDANCE WITH THE FOLLOWING PROCEDURE:

PIPE LINE _____ FROM _____ TO _____

DESCRIPTION OF FACILITY TESTED See Sketch D-5131

SECTION LENGTH See Sketch PIPE DIAMETER _____ WALL THICKNESS _____ GRADE _____

LOCATION OF TEST PRESSURE RECORDER CONNECTION Tank #4

LOCATION OF TEMPERATURE RECORDER BULB Westshore Pump (Discharge

INITIAL PRESSURE AT POINT OF TEST ~~415~~ 415 PSIG TIME 4.34 AM PM

INITIAL TEMPERATURE OF TEST SECTION ~~42~~ 38 °F ELEVATION AT POINT OF TEST — MSL

INITIAL PRESSURE AT LOWEST ELEVATION POINT IN SECTION — PSIG;

ELEVATION — MSL; MP. —. THE PRESSURE WAS ☐ MEASURED ☐ CALCULATED

INITIAL PRESSURE AT HIGHEST ELEVATION POINT IN SECTION — PSIG;

ELEVATION — MSL; MP. —. THE PRESSURE WAS ☐ MEASURED ☐ CALCULATED

FINAL PRESSURE AT POINT OF TEST 395 PSIG TIME 4.35 AM PM

FINAL TEMPERATURE OF TEST SECTION 37 °F

TOTAL FLUID INJECTED — GAL. TOTAL FLUID WITHDRAWN — GAL.

NET CHANGE IN VOLUME OF THE TEST SECTION ± — GAL.

LENGTH OF TEST 24 HRS. 1 MIN.; TESTING FLUID H_2O, SPEC. GVTY. 1 TEMP. 60 °F

INITIAL PRESSURE — % OF SMYS AT THE TEST SITE — % AT HIGH POINT — % AT LOW POINT

MINIMUM TEST PRESSURE DURING A SELECTED 24-HOUR PERIOD (TEST PRESSURE) 395 PSIG

MAXIMUM ALLOWABLE OPERATING PRESSURE — PSIG. BASED ON — % SMYS

OR —

WERE THERE ANY LEAKS? ☐ YES ☒ NO; IF YES, EXPLAIN _____

WAS EVERY COMPONENT THAT WILL BE SUBJECTED TO THE SYSTEM WORKING PRESSURE HYDROSTATICALLY TESTED? ☒ YES ☐ NO; IF NO, EXPLAIN _____

PRESSURE RECORDER MAKE AND SERIAL NO. Master 80479

TEMPERATURE RECORDER MAKE AND SERIAL NO. Antek 20309 —

REMARKS: Start 4.34 PM. Pressure Recorder shows 4.50 PM 11-9-72 Started Rain 9.00 AM 11-10-72

CONDUCTED BY [signature] TITLE Supt Morrison Const Co.

CERTIFIED BY [signature] TITLE PE Morrison Const Co

WITNESSED BY [signature] TITLE _____

WITNESSED BY _____ TITLE _____

CERTIFICATION OF PIPE LINE HYDROSTATIC PRESSURE TEST

PRESSURE RECORDER CALIBRATION

CALIBRATION BEFORE TEST

PRESSURE RECORDER	DEADWEIGHT TESTER
415	415
305	300
205	200
108	102

COMPARISON DURING TEST

PRESSURE RECORDER	DEADWEIGHT TESTER

COMPARISON AFTER TEST

PRESSURE RECORDER	DEADWEIGHT TESTER
395	~~390~~ 390
305	300
210	205
100	95

CALIBRATED BY G.L. Cornett

CHECKED BY Earl F Anderson

CHECKED BY G.L. Cornett

DEADWEIGHT TESTER MAKE & SERIAL NUMBER _____

INJECTION AND WITHDRAWAL DATA

FLUID INJECTION, GAL.	TIME
N/A	

FLUID WITHDRAWN, GAL.	TIME
N/A	

TOTAL INJECTION _____ GAL.

TOTAL WITHDRAWAL _____ GAL.

NET CHANGE IN VOLUME OF THE TEST SECTION ± _____ GAL.

DATA TAKEN BY _____ TITLE _____

CERTIFIED BY _____ TITLE _____

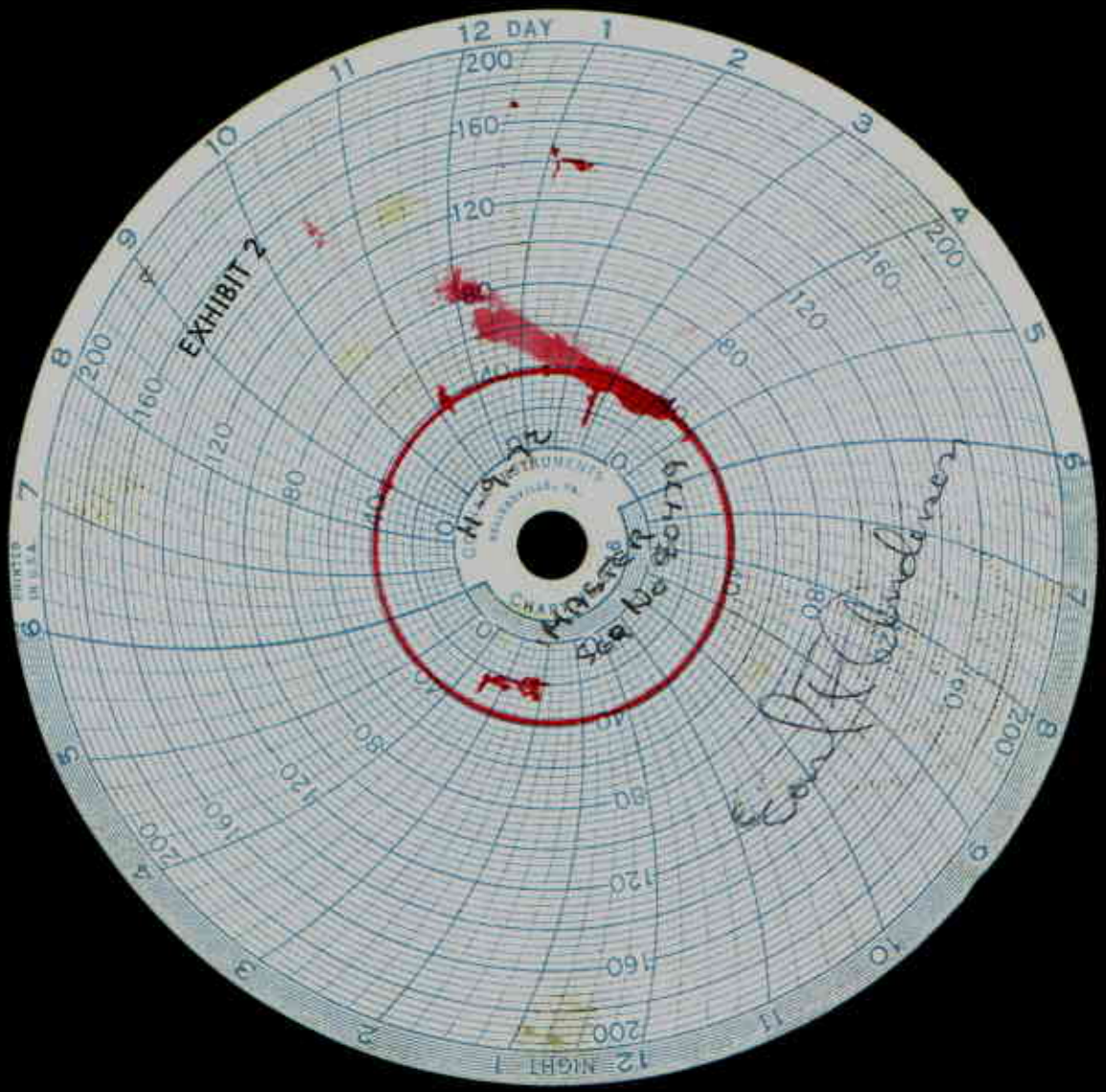


EXHIBIT 2
12 DAY 1
12 NIGHT 1
200
160
120
80
40
0

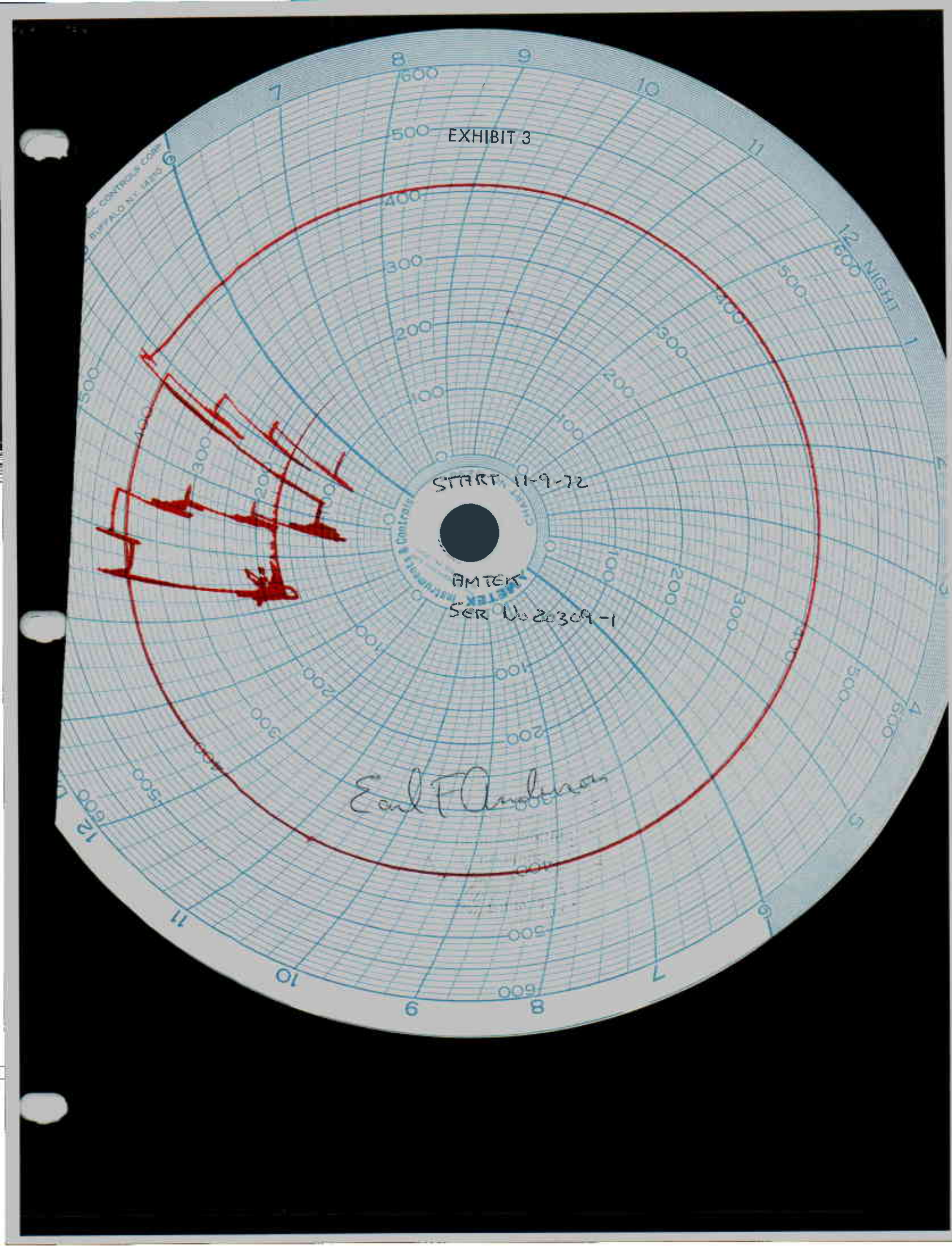
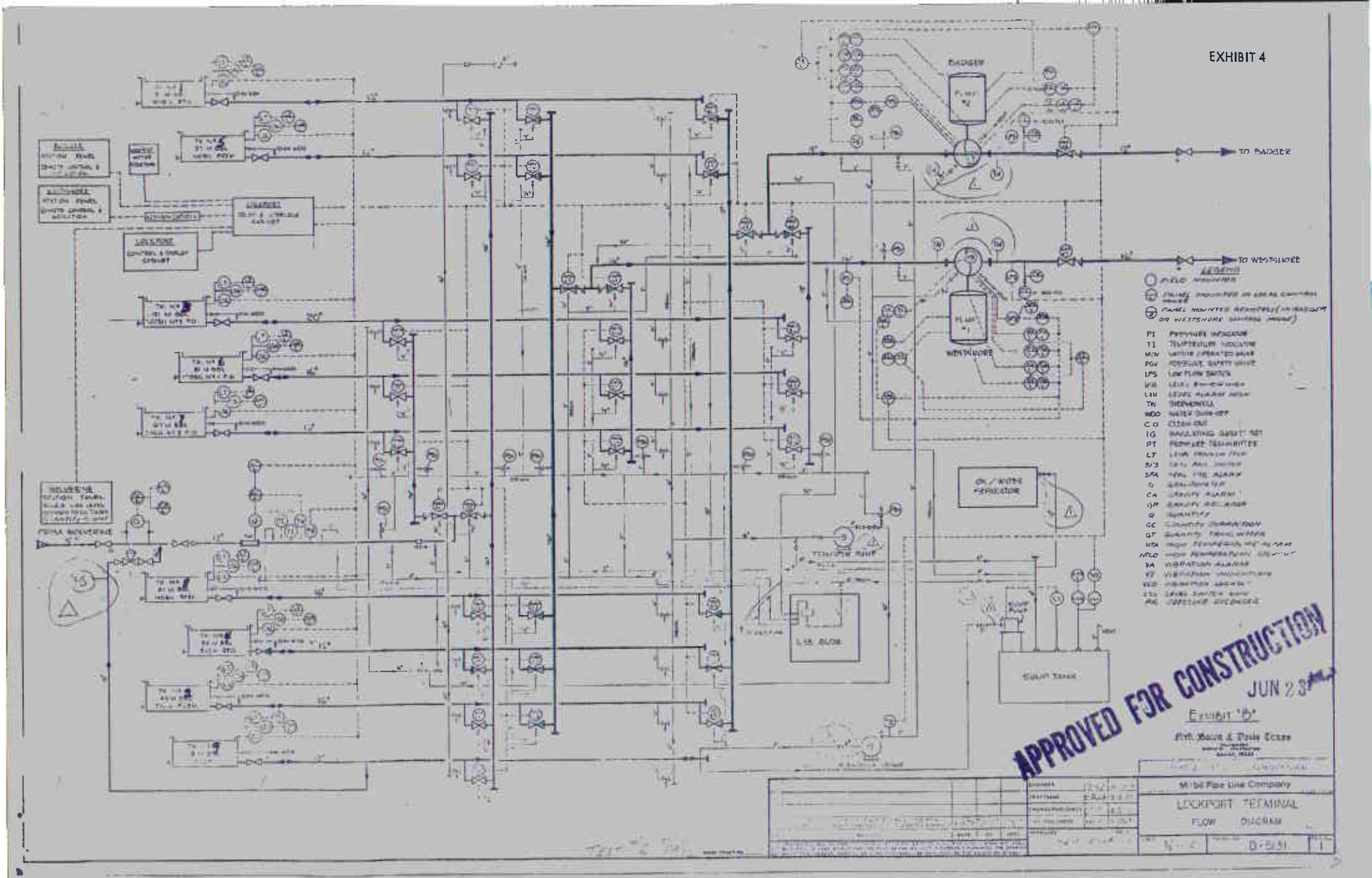


EXHIBIT 3
START 11-9-72
AMTEK
SER No 20309-1
Earl F Anderson

EXHIBIT 4


BADGER
TO BADGER
TO WESTSHORE
WESTSHORE
OIL / WATER SEPARATOR
LIQ. FLOW
EQUIP TANK
APPROVED FOR CONSTRUCTION
JUN 23
Exhibit "B"
Mobil Pipe Line Company
LOCKPORT TERMINAL
FLOW DIAGRAM

ATTACHMENT B

Pressure Test of Terminal Facilities

Mobil Oil Corporation's Lockport Terminal

Date and Time: From 9:25 a.m., December 14, to 9:37 a.m., December 15, 1973.

Description of Facilities Tested: The pipe, fittings, flanges, and valve in the West Shore vertical can type pump suction and discharge piping from the West Shore manifold splitter valves to the pump discharge valve at Mobil Oil Corporation's Lockport Terminal in Will County, Illinois, as shown on the attached sketch. The pump was not included in this test section.

Procedure: The test section was filled with #2 fuel oil and fuel oil was injected into the test section, raising the pressure to 410 psig. This pressure was reached at 3:12 p.m., December 13, and was held for 23 minutes. Sufficient fuel oil was then bled out of the test section to reduce the pressure to 100 psig. The pressure was held at 100 psig for 20 minutes. Sufficient fuel oil was again injected into the test section to raise the pressure to 455 psig, reaching this pressure at 4:00 p.m., December 13. From this point until 8:50 a.m., December 14, the pressure dropped steadily. The entire test section was exposed and close visual inspections were made and no leaks were found. At 9:05 a.m., December 14, fuel oil was again injected into the test section, raising the pressure from 140 psig to 457 psig. This pressure was reached at 9:25 a.m., December 14, 1973, and the 24-hour test was begun at this time. From this time until approximately 3:30 p.m. the pressure rose steadily, reaching a maximum pressure of 540 psig. From 3:30 p.m. the pressure dropped slowly, reaching 409 psig at 9:05 a.m. December 15. From 9:05 a.m. until 9:37 a.m., the pressure increased 1 psi to 410 psig. At 9:37 a.m., December 15, 1973, the test was ended. The test section was exposed during the test period, and numerous visual inspections were made during the test period and no leaks were found.

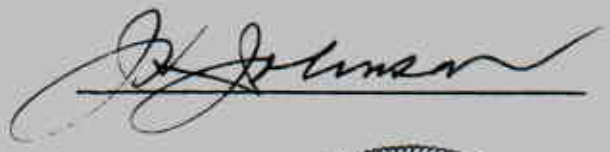
Temperature Variations: The test section was exposed to ambient temperature variations during the test period. The fuel oil used as the test fluid was taken out of an underground pipe and was considerably warmer than the atmospheric temperature. When the fluid was injected into the aboveground test section, it began cooling, which is the reason for the large pressure drop from 4:00 p.m., December 13, until 9:00 a.m., December 14. After the test fluid reached thermal equilibrium with the ambient temperature, it then followed the ambient temperature variations. The temperature of the test fluid, and thus the pressure rose during late morning and afternoon hours and dropped during the evening and early morning hours.

Personnel Present During the Test:

G. D. French, Foreman, Midwestern Contractors, Inc.
W. H. Mullenweg, Mechanical Engineer, Mobil Pipe Line Company

Conclusion: The test section was entirely exposed and subjected to numerous visual inspections during the test period and no leaks were found. Because of this, it must be concluded that the pressure variations during the test period were due entirely to temperature, and the test section is free of leaks.

This constitutes a valid pressure test of 409 psig and 24 hours 12 minutes duration.



REGISTERED STRUCTURAL ENGINEER

CO 8482 (2-71)

CERTIFICATION OF PIPE LINE HYDROSTATIC PRESSURE TEST

CARRIER NAME Mobil Oil Corporation

TESTING COMPANY NAME Midwestern Contractors

PRESSURE TEST No. WI-240 DATE 12-14 & 15-73

THIS IS TO CERTIFY THAT THE PIPE LINE OR PIPE LINE SECTION DESCRIBED BELOW WAS HYDROSTATICALLY PRESSURE TESTED IN ACCORDANCE WITH THE FOLLOWING PROCEDURE:

PIPE LINE Mobil Lockport Terminal Westshore Pump Piping FROM _____ TO _____

DESCRIPTION OF FACILITY TESTED 16" Suction & Discharge Lines from Manifold Splitter Valves to Pump Discharge Valv.

SECTION LENGTH _____ PIPE DIAMETER 16" WALL THICKNESS .375" GRADE B

LOCATION OF TEST PRESSURE RECORDER CONNECTION _____

LOCATION OF TEMPERATURE RECORDER BULB Taped to the outside of the pipe.

INITIAL PRESSURE AT POINT OF TEST 457 PSIG TIME 9:25 AM PM

INITIAL TEMPERATURE OF TEST SECTION 19 °F ELEVATION AT POINT OF TEST 650 MSL

INITIAL PRESSURE AT LOWEST ELEVATION POINT IN SECTION 457 PSIG;

ELEVATION 650 MSL; MP. - . THE PRESSURE WAS [X] MEASURED [ ] CALCULATED

INITIAL PRESSURE AT HIGHEST ELEVATION POINT IN SECTION 457 PSIG;

ELEVATION 650 MSL; MP. - . THE PRESSURE WAS [X] MEASURED [ ] CALCULATED

FINAL PRESSURE AT POINT OF TEST 410 PSIG TIME 9:37 AM PM

FINAL TEMPERATURE OF TEST SECTION 17 °F

TOTAL FLUID INJECTED - GAL. TOTAL FLUID WITHDRAWN - GAL.

NET CHANGE IN VOLUME OF THE TEST SECTION ± - GAL.

LENGTH OF TEST 24 HRS. 12 MIN.; TESTING FLUID #2 Fuel Oil, SPEC. GVTY. _____ TEMP. _____ °F

INITIAL PRESSURE 27.9 % OF SMYS AT THE TEST SITE 27.9 % AT HIGH POINT 27.9% AT LOW POINT

MINIMUM TEST PRESSURE DURING A SELECTED 24-HOUR PERIOD (TEST PRESSURE) 409 PSIG

MAXIMUM ALLOWABLE OPERATING PRESSURE 275 PSIG. BASED ON - % SMYS

OR ANSI 150 Flanges and Valves in the test section

WERE THERE ANY LEAKS? [ ] YES [X] NO; IF YES, EXPLAIN _____

WAS EVERY COMPONENT THAT WILL BE SUBJECTED TO THE SYSTEM WORKING PRESSURE HYDROSTATICALLY TESTED? [X] YES [ ] NO; IF NO, EXPLAIN _____

PRESSURE RECORDER MAKE AND SERIAL NO. _____

TEMPERATURE RECORDER MAKE AND SERIAL NO. _____

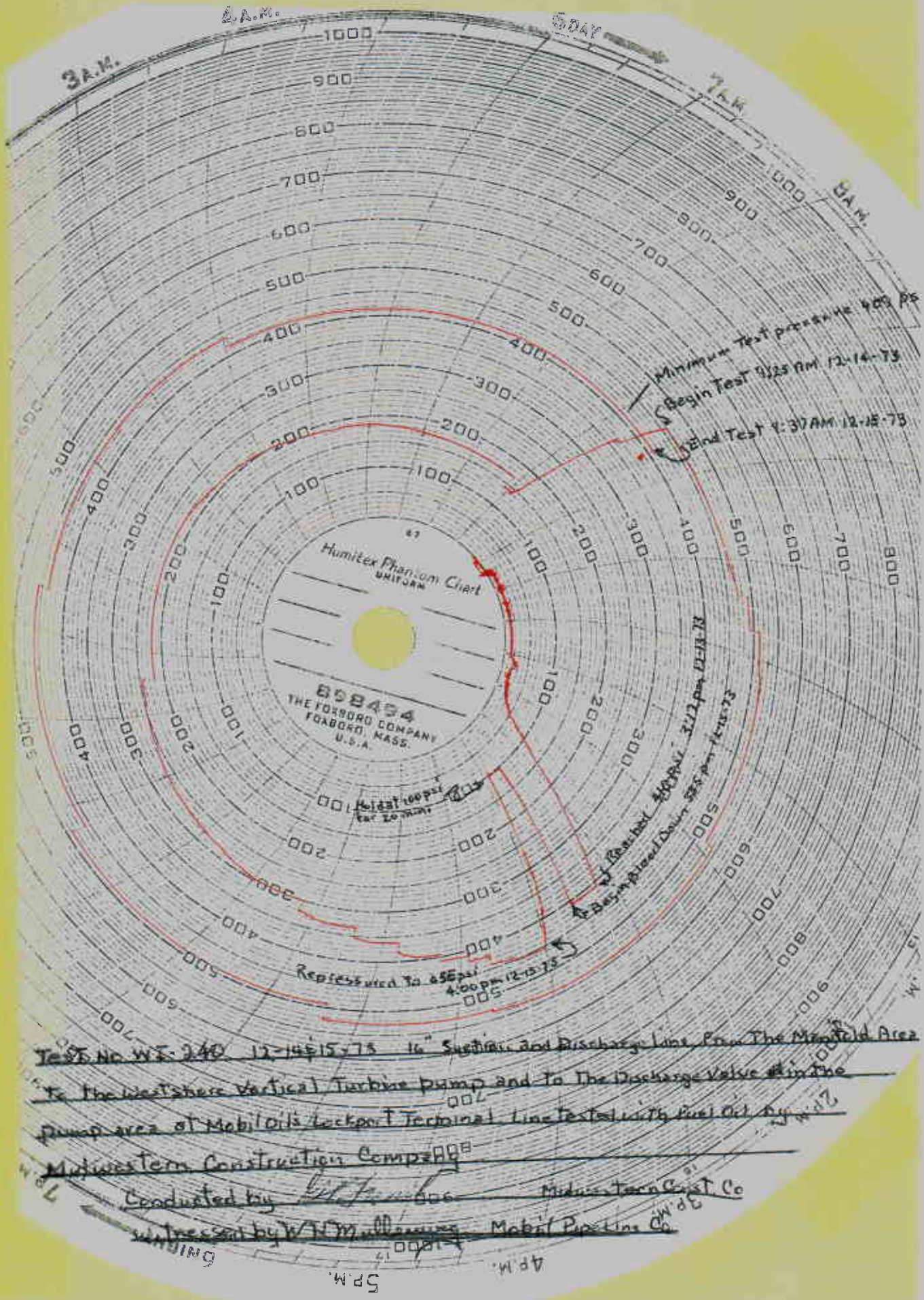
REMARKS: The entire test section was above ground and visually inspected several times during the test period - no leaks were found.

CONDUCTED BY _____ TITLE _____

CERTIFIED BY _____ TITLE _____

WITNESSED BY W.H. Mullenweg TITLE Mech Engineer Mobil Pipe Line Company

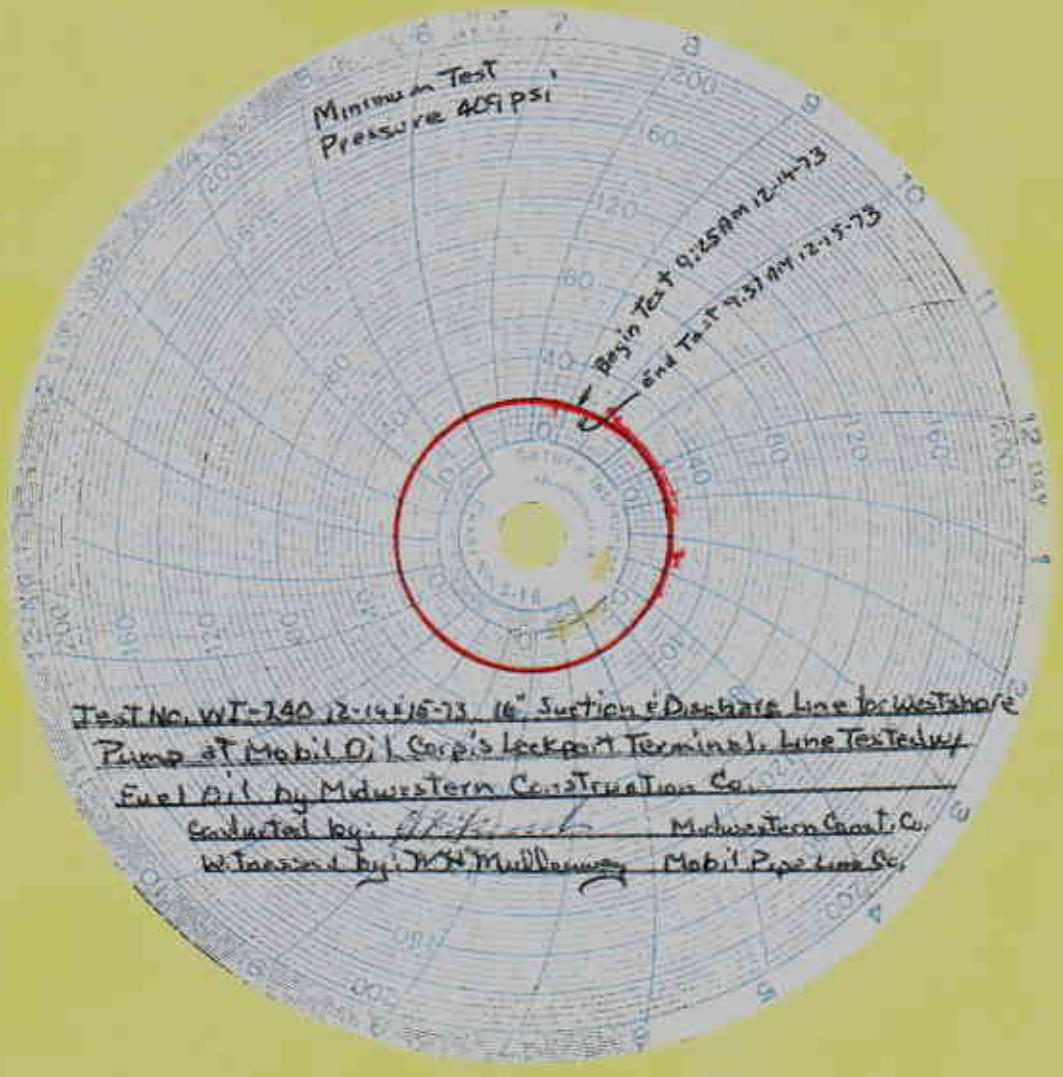
WITNESSED BY _____ TITLE _____



Test No. WT-240 12-14&15-73 16" Suction and Discharge Line From The Manifold Area To The Westshore Vertical Turbine pump and To The Discharge Valve in the pump area of Mobil Oil's Lockport Terminal Line Tested with Fuel Oil by Midwestern Construction Company

Conducted by [illegible] Midwestern Const Co

Witnessed by W.T. Mullenmeister Mobil Pipeline Co



Test No. WT-240 12-4 & 5-73. 16" Suction & Discharge Line for Westshore
Pump at Mobil Oil Corp's Lockport Terminal. Line Tested w/
Fuel Oil by Midwestern Construction Co.

Conducted by: _____ Midwestern Const. Co.

Witnessed by: W. H. Muilenburg Mobil Pipe Line Co.

BY _____ DATE _____ SUBJECT Pressure Test w/ I-240 _____ SHEET NO. _____ OF _____

CHKD. BY _____ DATE _____ Mobil Oil Co.'s Lockport Terminal _____ JOB NO. _____

_____ will County, Illinois _____ _____