



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 26, 2009

Mr. Randy Cleveland
US Production Manager
ExxonMobil US Production, a Division of Exxon Mobil Corporation
14950 Heathrow Forest Parkway, MI-3004B
Houston, TX 77032

CPF 4-2009-2001W

Dear Mr. Cleveland:

On November 4-6, 2007, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your Offshore Gas pipeline system in Grand Isle, TX and the Gulf of Mexico.

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 violation(s) are:

1. **§192.465 External corrosion control: Monitoring.**
(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463.

At the time of the inspection, records indicated that the operator failed to test each pipeline that is under cathodic protection within the required 15 month interval. As demonstrated in the operator's records of the Offshore Gas Unit, the annual pipe to soil survey from May 20, 2006 to October 11, 2007 exceeded the 15 month requirement.

2. **§192.481 Atmospheric corrosion control: Monitoring.**

(A) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

If the pipeline is located:	Then the frequency of inspection is:
Onshore	At least once every 3 calendar years, but with intervals not exceeding 39 months
Offshore	At least once each calendar year, but with intervals not exceeding 15 months

At the time of the inspection, records indicated that the operator failed to conduct the required inspections for atmospheric corrosion within the 15 month interval for the offshore portion of the Unit. As indicated in the operator's records of the Offshore Gas Unit, the Atmospheric Corrosion Surveys from May 20, 2006 to October 11, 2007 exceeded the 15 month requirement.

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 violation 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. Failure to do so will result in ExxonMobil US Production 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 4-2009-2001W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,



R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous
Materials Safety Administration