

NOTICE OF AMENDMENT

ELECTRONIC MAIL - RETURN RECEIPT REQUESTED

April 27, 2021

Steve Yatauro
President
ExxonMobil Pipeline Company
22777 Springwoods Village Parkway
Spring, Texas 77389

CPF 4-2021-017-NOA

Dear Mr. Yatauro:

From September 14, 2020 through October 30, 2020, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected the plans and procedures of ExxonMobil Pipeline Company (ExxonMobil) for its hazardous liquid pipeline systems located in Texas, Louisiana, and the Gulf of Mexico. The inspection was conducted virtually due to COVID-19 travel restrictions.

Based on the inspection, PHMSA identified the apparent inadequacies found within ExxonMobil's plans or procedures, as described below:

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

§ 195.54 - Accident reports.

(a) ...

(b) Whenever an operator receives any changes in the information reported or additions to the original report on DOT Form 7000-1, it shall file a supplemental report within 30 days.

ExxonMobil's written Operations and Maintenance manual titled, *DOT Liquids Manual, (Revision October 16, 2019) Section 195.54 Accident Reports*, is inadequate because it does not include the 30-day requirement to file a supplemental report after changes have been identified as required by §195.54.

ExxonMobil must amend its written procedure to require that whenever an operator receives any changes in the information reported to the original report on DOT Form 7000-1, the operator shall file a supplemental report within 30 days.

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

(a) ...

(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:

(1) ...

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

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

(a) ...

(e) *Corrective action.* You must correct any identified deficiency in corrosion control as required by § 195.401(b). However, if the deficiency involves a pipeline in an integrity management program under § 195.452, you must correct the deficiency as required by § 195.452(h).

ExxonMobil's written procedure *Facilities Inspection and Maintenance Management System, Cathodic Protection Program (Revision 16.0 dated 9/29/2020)* is inadequate because it does not include guidance to correct identified deficiencies in its corrosion control or provide a timeframe for making those corrections to its cathodic protection system.

ExxonMobil must amend its written procedure to include detailed guidance on correcting identified deficiencies in corrosion control as required by § 195.401(b). ExxonMobil must also provide a timeframe for when it should correct all identified corrosion control deficiencies to ensure the adequacy of corrosion control protection, including an appropriate timeframe for repairing or replacing test lead stations and test lead wires when they are found to be damaged.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Compliance Proceedings. Please refer to this document and note the response options. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211. 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 your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). 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.

It is requested (not mandated) that ExxonMobil Pipeline Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Mary L. McDaniel, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2021-017-NOA**, and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Mary L. McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

cc: Jeb Montgomery, Pipeline Safety Advisor, ExxonMobil Pipeline Company,
Jason.j.montgomery@exxonmobil.com