



SENT VIA EMAIL: bryan.lethcoe@dot.gov

May 28, 2025

Mr. Bryan J. Lethcoe
Director, Southwest Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074

RE: CPF 4-2025-0029-NOPV
2024 ExxonMobil Wyoming Onshore Liquid Line Inspection
Follow-up Response

Dear Mr. Lethcoe:

ExxonMobil Upstream Oil & Gas, US Conventional ("ExxonMobil" or "Company") received the Notice of Probable Violation (NOPV) and Proposed Compliance Order dated May 8, 2025, from the Pipeline and Hazardous Materials Safety Administration (PHMSA). It is alleged that ExxonMobil has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

Possible inadequacies appear in bolded text with the Company's response to each immediately following the bolded text.

1. **§ 195.583 – What must I do to monitor atmospheric corrosion control?**
(a) You 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.

(b) During inspections you must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

ExxonMobil failed to inspect each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at least once every 3 calendar years, but with intervals not exceeding 39 months, paying particular attention during inspections to pipe under thermal insulation in accordance with § 195.583(b) and its atmospheric corrosion procedures.

Specifically, ExxonMobil failed to inspect pipe under thermal insulation at the Rock Springs metering station since the pipeline came into service.

ExxonMobil's procedure, Monitoring for Atmospheric Corrosion, in its Operation, Maintenance, & Emergency Manual for DOT Hazardous Liquid Pipelines (Rev. December 2023; Version 1), Section 38.3 Process, step 4, requires giving particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water. However, during PHMSA's inspection, ExxonMobil was unable to provide past atmospheric corrosion control records for the pipe under thermal insulation at the Rock Springs Metering Station.

Therefore, ExxonMobil failed to inspect each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at least once every 3 calendar years, but with intervals not exceeding 39 months, paying particular attention to pipe under thermal insulation in accordance with § 195.583(b) and its atmospheric corrosion inspection procedures.

After the inspection, ExxonMobil submitted supporting documentation to address the alleged violation, including copies of DOT Form 9D and a work order, demonstrating that the insulation was removed from the pipe segment identified during the inspection as having thermal insulation. The DOT Form 9D is used to document results of atmospheric corrosion survey. The form outlines, but is not limited to, the following steps:

- The piping insulation was removed to allow for an external coating inspection.
- The survey included photographs of the identified pipeline segment, showing no evidence of external coating damage or general corrosion.
- The insulation was permanently removed, and no other segments of the pipeline system have insulation. The reason for the presence of insulation on this segment remains unknown.

In reference to the Proposed Compliance Order, **“In regard to Item 1 of the Notice pertaining to ExxonMobil's failure to give particular attention to pipe under thermal insulation during inspections, ExxonMobil must identify all jurisdictional pipelines with thermal insulation for its Wyoming CO2 pipeline system. If a pipe segment is identified as having thermal insulation, ExxonMobil must provide the last two cycles of atmospheric corrosion inspections for that pipe segment that details the condition of the pipe underneath the insulation, and pictures showing that the pipeline can be inspected underneath the insulation. If the insulated pipe cannot be inspected in accordance with the requirements of § 195.583(b) and ExxonMobil's atmospheric corrosion**

inspection procedures, ExxonMobil must modify or remove the insulation. After modification or removal of the insulation, ExxonMobil must conduct atmospheric corrosion inspections of those pipelines.

As previously mentioned, an atmospheric corrosion inspection was conducted, which led to the permanent removal of thermal insulation from the affected piping, and no other segments of the pipeline system have insulation. The inspection included photographic evidence confirming there was no external coating damage or general corrosion present.

ExxonMobil acknowledges that the inspection under thermal insulation was inadvertently missed. This oversight was unintentional, and it is important to note that ExxonMobil has consistently performed other routine inspections in this area, including:

- **Valve maintenance program** – conducted semi-annually
- **Metering calibration and inspection** – conducted quarterly

I trust that this response adequately addresses your concerns. Regarding the NOPV that includes a Proposed Compliance Order (option 2), ExxonMobil has chosen not to contest the allegations. However, the company is submitting an explanation in the hope that PHMSA will take it into consideration when determining whether to modify the proposed order.

If you have any questions, please contact Adolfo Calero, Regulatory Specialist, at adolfo.a.calero@exxonmobil.com or 346-474-9103.

Respectfully submitted,

Signed by:

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Scott W. Gillis

May 29, 2025

Wyoming Safety, Security, Health, and Environment Supervisor
ExxonMobil Upstream Oil & Gas, US Conventional