

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 8, 1997

Mr. R.A. Rabinow  
President  
Exxon Pipeline Company  
800 Bell Street  
Houston, TX 77001

CPF No. 57501-C

Dear Mr. Rabinow:

On November 25, 1996, a representative of the Western Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, observed an exposed pipeline approximately 5 miles south of Laurel, MT, adjacent to Highway 310.

As a result of the observation, a cause for concern was noted on this area of your pipeline system. We hope you also find the area, as noted below, worthy of your attention.

§195.248 states that unless specifically exempted in this subpart, all pipe must be buried so that it is below the level of cultivation. Except as provided in paragraph (b) of this section, the pipe must be installed so that the cover between the top of the pipe and the ground level, road bed, river bottom, or sea bottom, as applicable, complies with the following table:

Location	Cover (inches)	
	For normal excavation	For rock excavation <sup>1</sup>
Industrial, commercial, and residential areas	36	30
Crossings of inland bodies of water with a width of at least 100 ft from high water mark to high water mark	48	18
Drainage ditches at public roads and railroads	36	36
Deepwater port safety zone	48	24
Gulf of Mexico and its inlets and other offshore areas under water less than 3.7 m (12 ft) deep as measured from the mean low tide	36	18
Any other area	30	18

<sup>1</sup>Rock excavation is any excavation that requires blasting or removal by equivalent means.

(b) Except for the Gulf of Mexico and its inlets, less cover than the minimum required by paragraph (a) of this section and §195.210 may be used if-

- (1) It is impracticable to comply with the minimum cover requirements; and
- (2) Additional protection is provided that is equivalent to the minimum required cover.

Exxon does not have a section of its pipeline buried according to the above table. Figure A shows the pipeline in question approximately 5 miles' South of Laurel, MT, adjacent to Highway 310.



Figure A -  
11/25/96

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system was constructed before March 31, 1970, and is therefore grand fathered to the design and construction requirements of the Pipeline Safety Regulations. We hope that you will consider this area of concern to further improve your present level of safety. If we can answer any questions, or be of any help, please call me at 303-231-5701.

Sincerely,

Edward J. Ondak  
Director