

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 20, 1998

Mr. Chester Morris Jr., Vice President
Mobil Pipe Line Company
1201 Elm Street
Dallas, Texas 75221

Dear Mr. Morris:

CPF No. 48501W

Between July 22 and November 21, 1997, a representative of the Southwest Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of your pipeline facilities and records for all your facilities in the states of Oklahoma, Louisiana, and Texas.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 195. The items inspected and the probable violations are:

1. **§ 195.416(e) External Corrosion Control, whenever any buried pipe is exposed for any reason, the operator shall examine the pipe for evidence of external corrosion. If the operator finds that there is active corrosion, that the surface of the pipe is generally pitted, or shall investigate further to determine the extent of the corrosion.**

At the time of the inspection, Mobil's representative indicated to our inspector that you have no records showing you have performed the inspection on the overhead crossings, and exposed piping every three years, as directed in Mobil's Operating and Maintenance procedure manual.

2. **§ 195.418(c) Internal Corrosion Control, the operator shall, at intervals not exceeding 7 ½ months, but at least twice each calendar year, examine coupons or other types of monitoring equipment to determine the effectiveness of the inhibitors or the extent of any corrosion.**

At the time of this inspection, your corrosion coupon inspection records indicated, 25 of the internal corrosion coupons for the breakout tanks at the Corsicana Tank Farm were not examined at the 7½ month maximum intervals. (The coupon was inserted on September 9, 1996 and the date the coupon pull out was on May 20, 1997.)

The internal corrosion coupon inserted in Mobil's 16-inch crude oil pipeline at the Sun Terminal between Orange and Beaumont, Texas, was not examined twice in calendar year 1996 nor during the 7½ month maximum interval. (The coupon was inserted on June 4, 1996, pulled out for inspection on March 6, 1997.)

Under 49 United States Code, §60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations.

We have reviewed the circumstances and supporting documents involved for the violations in this case, and have decided not to assess you a civil penalty. We advise you, however, that should you not correct the circumstances leading to the violations we will take enforcement action when and if the continued violations come to our attention. Please refer to CPF No. 48501W in any correspondence/communication on this matter.

Sincerely,

R. M. Seeley
Regional Director, Southwest Region