

WARNING LETTER

January 30, 2001

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. John Chaplin
Manager, Production U.S. East
Mobil Oil Exploration & Producing Southeast, Inc.
P.O. Box 61707
New Orleans, LA 70161

CPF NO. 220012001W

Dear Mr. Chaplin:

On November 6 and 7, 2000, representatives of the Southern Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an inspection of your offshore Mobile Bay, Alabama pipeline facilities, and reviewed records at your Coden, Alabama office. As a result of the inspection, it appears that you have committed a probable violation as noted below of pipeline safety regulations Title 49, Code of Federal Regulations, Part 192.

The probable violation is:

§192.605 Procedural manual for operations, maintenance, and emergencies

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response . . .

. . . (b)(3) Making construction records, maps, and operating history available to appropriate operating personnel.

In that your "change" procedures were not followed, in that records were not adequately revised and made available to the appropriate operating personnel, subsequent to a November, 1998 increase in operating pressure on the 6" fuel gas line (Line FG-6-B) traversing between Mobil Platforms MB-76 "A-AUX" and MO-823 "A":

- The pipeline MAOP was incorrectly listed as 740 psig (MAOP is 1480); and,
- Fuel gas piping system safety flow diagram and inspection records (MB-76 "A-AUX" platform) were inaccurate - they did not reflect the 1998 facility and pressure changes.

The changes affected the operation of Line FG-6-B.
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 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 the continued violations come to our attention.

You will not hear from us again with regard to the noted inspection and our subsequent action. Because of the good faith that you have exhibited up to this time, we expect that you will act to bring your pipeline (and/or your operations) into compliance with pipeline safety regulations.

Sincerely,

Frederick A. Joyner
Director, Southern Region
Office of Pipeline Safety

cc: Compliance Registry, OPS Headquarters