

Name of Operator: Mobil Pipeline Company (Exxon/Mobil 1/2002) OPID 12628

HQ Address: Moble Pipeline Company 800 Bell Street Houston, Texas 77002	System/Unit Name Address: Corsicana Area UREC 3944 1604 South 15 th Street Corsicana, Texas 75151
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Co. Official (Pres or VP) Bruce Ference, VP Operations	Telephone number: 903-654-5331
Telephone number: 713-656-2227	Fax number: 903-654-5361
Fax number: 713-656-2170	
Emergency Telephone: 214-742-3106 (24 hr)	Emergency Telephone: 214-742-3106 (24 hr)

Operator ID: 12628 Unit ID: 3944 Activity ID: ~~91360~~ 91360

Unit IDs of adjacent Operator units:

Persons Interviewed	Titles	Phone Numbers
Mike Adams	Pipeline Safety Advisor	713-656-3926
Dale Comeaux	Operations Supervisor	903-654-5331
Larry "Doc" Hawthorne	Field Regulatory Specialist	903-654-5345
Curtis Holt	Sr. Corrosion Technician	903-654-5325

OPS Representative(s): Bill Bertges *[Signature]* 12/11/02 - 12/18/2001

Company system maps - (copies for regional files, yes / no): Yes

System/Unit Description:
 4"/8" NGL from Lone Grove to Corsicana, Tx (4" NGL out of Lonegrove idled w/nitrogen)
 16" Crude from Ringgold, Tx to Corsicana, Tx 154 miles
 20" Crude from Corsicana to Groveton, Tx
 20" Crude from Corsicana to Quitman, Tx 160 miles (Arkansas State Line)
 12" Crude Kilgore to Corsicana, Tx 104 miles (New - picked up from TxRRC 2 years ago since all product leaves state.)

Portion of Unit Inspected: *All segments were inspected by vehicle. No major concerns were noted. INSPECTION NOTES: Keller Sta. 2-2000 HP VARIABLE DRIVE PUMPS, 16" Crude 4" & 8" Idle NGL (4" North and 8" South of Station) 4"-1.053V, 16"-1.035V, Rectifier 14V, 26A, ESD @ GATE/PUMPS, FIRE EXT-OK, Fenced and locked, VALVES checked & locked. Signs-OK. KRUM STA. FLEX FLOW REG w/N₂ to keep valve open, RP-RAP PLACED IN FRONT OF STATION TO PROTECT AGAINST VEHICLE TRAFFIC. 8"-1.634V. NORTH GAINSVILLE STA 4" OUTGOING-1.044V. SIVELLS Bend Sta CP-1.844V. LONE GROVE STA. VACANT - USED FOR TRUCKING TERMINAL CP-1.840. HOOKER STA GATH. NON-SUR. TANK, 11/18/02 by B. No Name BOOSTER #2 MAINLINE PUMPS, BACKUP GENERATOR - REPLACING PIG-SIE.*

Was a Team O&M inspection completed previously? *Yes 6/9/94* If yes, document date? *Rescheduled for later not complete*

Note: If a Team O&M inspection was completed within the five (5) years, it is not necessary to review the entire O&M manual. However, modifications to the manual should be reviewed.

GATE VALVE 136 - SHORTED CS4. SIGN TEL: 214-742-3106 CP-1279/1-269, Station 443 ML Block valve in vault. VALVE EXT HANDLE USED TO ELIMINATE ENTRY. HOOKER STA - JAYHAWK P/L. OK. OPTIMA CAKE STA - OK HARDESTY CP-1.41654 0.394V, BEAVER STA. CP 1.659V, RECT. OK

Field Inspection ONLY
 NOTE: N/C x'd for Hates Block means no Hates Inspection made.

MOP/Overpressure Protection Hates N/A means not applicable to Hates Location Field only.

Overpressure protection is essential to protect the pipeline from unexpected events. The operator should have procedures in place to ensure that the overpressure protective devices are adequate and in good working condition.

195.406(a)(1) Maximum Operating Pressure - Determining the MOP from design or test pressure or integrity calculations.

195.404(a)(3) Maps and Records - Each operator shall maintain current records of the maximum operating pressure of each pipeline system.

G-Q1) Does the operator have records to support the MOP applied to each line segment?

R1) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q1) Headquarters				X
Q1) Field	X			
R1) Headquarters				X
R1) Field	X			

1) Comments: Field receives letter for Engineering indicating required set points.
 Pressure recording charts document actual operating suction/discharge pump pressures including SCADA data logger at Dallas for all pipeline systems.

195.404(b)(1) Record of Discharge Pressure - Actual operating pressures representing three years of data.

G-Q2) Does the operator's pressure recording system retain sufficient details of pressure events, so as to exhibit pressure spikes that may have breached the MOP?

R2) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q2) Headquarters				X
Q2) Field	X			
R2) Headquarters				X
R2) Field	X			

2) Comments: Operator utilizes pressure recording charts that adequately provide sufficient detail to indicate any pressure event.

195.428(a) Overpressure Safety Devices - Each operator shall at intervals not exceeding 15 months, but at least each calendar year, or in case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7 ½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good working condition, and is adequate from the stand point of capacity and reliability of operation for the service in which it is used.

G-Q3) Have pressure safety devices been checked for pressure accuracy in one year intervals, or six month intervals for highly volatile liquids?

R3) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q3) Headquarters				X
Q3) Field	X			
R3) Headquarters				X
R3) Field	X			

3) Comments:

Mobil tests relief valves twice each year for both crude & NGL product pipelines. They are in the process of converting from MAXIMO to SAPPM (preventative maintenance software application - work order accounting management system.)

195.128 Station Piping - Must meet applicable requirements if subjected to system line pressure.

G-Q4) Have the appropriate pressure controlling devices been installed to protect the lower-pressure piping in the manifold and/or at pump stations?

R4) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q4) Headquarters				X
Q4) Field	X			
R4) Headquarters				X
R4) Field	X			

4) Comments:

Pressure switches and relief valves are installed to prevent overpressure. Check valves installed on aboveground manifold piping for overpressure protection.

195.402(d)(1) Abnormal Operation - Responding to, investigating and correcting the cause of unintended closure of valves or shutdowns; and an increase or decrease in pressure or flow rate outside normal operating limits.

195.404(b)(2) Maps and Records - Each operator shall maintain for at least 3 years daily operating records of any emergency or abnormal operation.

G-Q5) Did the safety devices function properly during abnormal operation?

R5) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q5) Headquarters				X
Q5) Field	X			
R5) Headquarters				X
R5) Field	X			

5) Comments: Operating records are maintained for at least three years.

195.402 (d)(2) Procedures for checking variations after abnormal operations - Checking for safe operation at sufficient critical locations to determine continued integrity and safe operation.

195.404(b)(2) Maps and Records - Each operator shall maintain for at least 3 years daily operating records of any emergency or abnormal operation.

G-Q6) Are procedures and forms used to document the occurrence of unscheduled shutdowns and over-pressure situations?

R6) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q6) Headquarters				X
Q6) Field	X			
R6) Headquarters				X
R6) Field	X			

6) Comments: Root cause analysis of abnormal or unusual operating condition would be conducted, and management of change process implemented to initiate actions necessary to prevent a re-occurrence.

195.402(d)(5) Procedural manual for operations, maintenance, and emergencies - Abnormal Operation - Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

G-Q7) Does the procedure direct the analysis of abnormal conditions to prevent future abnormal events?

R7) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q7) Headquarters				X
Q7) Field	X			
R7) Headquarters			X	
R7) Field			X	

7) Comments:

Procedure in Liquids O&M Procedural Manual.

195.302(c) - Compliance deadlines for pipelines that have not been pressure tested.

G-Q8) Has the operator developed a plan for testing its pipeline systems?

R8) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q8) Headquarters				X
Q8) Field	X			
R8) Headquarters				X
R8) Field	X			

8) Comments:

#1 20" ILI Crude working on finalizing data.
 #2 20" Crude scheduled
 12" NGL in program for next 3-5 years.
 All segments have been hydrostatically tested.

195.426 Scraper and Sphere Facilities - Pressure indication and relief devices.

G-Q9) Do traps have functioning visual or audible indications of pressure to alert operating and maintenance personnel about elevated trap pressure?

R9) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q9) Headquarters			X	
Q9) Field	X			
R9) Headquarters			X	
R9) Field	X			

9) Comments: All traps have gauges installed, and procedure requires use of a dip stick to determine if liquid level exists in trap prior to opening.

Inspection Criteria relating to SCADA and other Alarm Systems

195.262(a) Pump Station Ventilation and Warning Devices - Detecting hazardous vapors.

G-Q10) Has the operator installed warning devices in pump station buildings to warn of the presence of hazardous vapors?

R10) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q10) Headquarters			X	
Q10) Field			X	
R10) Headquarters			X	
R10) Field			X	

10) Comments: There are no enclosed pump station buildings in unit.

195.402(c)(9) Facilities not equipped to fail safe - As described in 195.402(c)(4), facilities that are located in areas that control the receipt and delivery of hazardous liquids would require an immediate response by the operator to prevent hazards to the public must be monitored... usually by SCADA if unattended.

G-Q11) Are all the unattended locations on the operator's system which control the receipt and delivery of hazardous liquids monitored?

R11) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q1) Headquarters			X	
Q11) Field	X			
R11) Headquarters			X	
R11) Field	X			

11) Comments:

SCADA in Dallas, Tx provides 24 hour continuous monitoring at all unattended locations.

195.408(a) Communications System for Pipeline Information - Each operator must have a communication system to provide for the transmission of information needed for the safe operation of its pipeline.

G-Q12) Will system operation be affected by communication outages or SCADA failure?

R12) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q12) Headquarters	X			X
Q12) Field				
R12) Headquarters				X
R12) Field	X			

12) Comments:

Dedicated 4 wire circuit land line to Dallas SCADA system. In the event of a communication outage, unattended pump station facilities would be manned.

G-Q13) Best Practice:

Does the operator have a means to prevent controller fatigue?

13) Comments: Not evaluated - field unit inspection only.

EVALUATION OF COMPUTATIONAL PIPELINE MONITORING (CPM) SYSTEMS FOR HAZARDOUS LIQUID PIPELINE SYSTEMS

195.134 Definition and application of the computational pipeline monitoring (CPM) leak detection system.

G-Q14) Does the operator have a leak detection system?

R14) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q14) Headquarters				X
Q14) Field			X	
R14) Headquarters				X
R14) Field			X	

14) Comments: Mobil SCADA system includes CPM leak detection system for the unit. Adequacy of CPM would be a headquarters inspection issue that was not checked.

195.404(c)(3) Maps and Records - Each operator shall maintain a records for two years.

G-Q15) Does the operator maintain records per the requirements of 195.404(c)(3)?

R15) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q15) Headquarters				X
Q15) Field			X	
R15) Headquarters				X
R15) Field			X	

15) Comments: CPM/SCADA system not evaluated in Dallas.

Engineering Drawing Review

195.402(c)(1) Maintenance and Normal Operation - Making construction records, maps, and operating history available for safe operation and maintenance.

G-Q16) How does the operator control engineering drawing revision, review, approval, and distribution?

R16) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q16) Headquarters				X
Q16) Field	X			
R16) Headquarters				X
R16) Field	X			

16) Comments:

Proposed drawing revisions go through the field Engineer at Corsicana for approval, then to Houston CAD Department, and then revised drawing is sent back to field.

195.404(a) Each operator shall maintain current maps and records of its pipeline systems.

Q17) Do the operator's "as-built" agree with field? Do the SCADA terminals get updates?

R17) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q17) Headquarters				X
Q17) Field	X			
R17) Headquarters				X
R17) Field	X			

17) Comments:

Reviewed random alignment drawings were found to have been adequately updated.

195.402(c)(1) Maintenance and Normal Operation - Making construction records, maps, and operating history available for safe operation and maintenance.

Q18) How are completed construction activities, such as facility modifications, communicated to the controller?

R18) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q18) Headquarters				X
Q18) Field	X			
R18) Headquarters				X
R18) Field	X			

18) Comments:

Field Engineer initiates the Mobil MOC process to the Control Center that includes revised drawings and description of any facility changes, including appropriate authorizations

Process Control and Flow Schematic Drawing Review

Differences between process control engineering drawings and pipeline facilities have resulted in incidents and abnormal operating conditions. We have found that physical changes made to facilities are sometimes not reflected in engineering drawing or SCADA displays. The company should have a procedure in place that ensures changes in the field are communicated to appropriate personnel and correspondence (i.e. maps, records and drawings) are corrected.

195.404(a) Each operator shall maintain current maps and records of its pipeline systems.

G-Q19) Do engineering, process control, and flow schematic drawings adequately depict current facilities and operations?

R19) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q19) Headquarters				X
Q19) Field	X			
R19) Headquarters				X
R19) Field	X			

19) Comments:

Management of Change (MOC) is in placed to assure appropriate operating changes are noted.

Review of First Discovery Reports

First discovery reports are reports that may identify potential problems on, or in the vicinity of the pipeline, that could affect pipeline integrity and/or public safety. These reports could include any pipeline safety inspection and/or survey reports, landowner or general public reported concerns, patrol reports. Listed below are a few high impact examples.

195.416(e) External Corrosion Control - the operator shall examine exposed pipe for external corrosion.

195.416(i) External Corrosion Control - the operator shall clean, coat for the prevention of atmospheric corrosion

195.401(b) Operation and Maintenance - the operator shall correct any condition that could adversely affect the safe operation of its pipeline within a reasonable time.

G-Q20) Does the operator disseminate, monitor, and follow-up the information obtained from first discovery reports?

R20) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q20) Headquarters				X
Q20) Field	X			
R20) Headquarters				X
R20) Field	X			

20) Comments:

Exposed pipe maintenance reports, work orders request are sent to Engineering for approval and determination of appropriate remedial action and schedule.

195.416(e) cont'd

G-Q21) Does the company follow-up and document discovered exposed spanning pipe in water and do they take fluctuating water levels into consideration?

R21) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q21) Headquarters				X
Q21) Field	X			
R21) Headquarters				X
R21) Field	X			

21) Comments: 5 year river crossing inspections conducted. All reported spans are reviewed by field engineer who calculates stress due to span to determined whether remedial action is required.

195.408(a) Each operator must have a communication system to provide for the transmission of information needed for the safe operation of its pipeline system, and (b) The communication system required by paragraph (a) of this section must, as a minimum, include means for: (1) Monitoring operational data as required by §195.402(c)(9);(2) Receiving notices from operator personnel, the public, and public authorities of abnormal or emergency conditions and sending this information to appropriate personnel or government agencies for corrective action;(3) Conducting two-way vocal communication between a control center and the scene of abnormal operations and emergencies; and (4) Providing communication with fire, police, and other public officials during emergency conditions, including a natural disaster.

G-Q22) How does the operator follow-up and document public/landowner complaints concerning safety and integrity issues?

R22) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q22) Headquarters				X
Q22) Field	X			
R22) Headquarters				X
R22) Field	X			

22) Comments:
Safety issues are handled by the field office, otherwise claims are handled by the ROW agent. Area Supervisor has authorization to investigate and take corrective action regarding any public complaints.

195.401(a) No operator may operate or maintain its pipeline systems at a level of safety lower than that required by this subpart and the procedures it is required to establish under §195.402(a) of this subpart; and (b) Whenever an operator discovers any condition that could adversely affect the safe operation of its pipeline system, it shall correct it within a reasonable time. However, if the condition is of such a nature that it presents an immediate hazard to persons or property, the operator may not operate the affected part of the system until it has corrected the unsafe condition.

195.404(b) Each operator shall maintain for at least 3 years daily operating records that indicate-

- (1) The discharge pressure at each pump station; and
- (2) Any emergency or abnormal operation to which the procedures under §195.402 apply.
- (c) Each operator shall maintain the following records for the periods specified;
 - (1) The date, location, and description of each repair made to pipe shall be maintained for the useful life of the pipe.
 - (2) The date, location, and description of each repair made to parts of the pipeline other than pipe shall be maintained for at least 1 year.
 - (3) A record of each inspection and test required by this subpart shall be maintained for at least 2 years or until the next inspection or test is performed, whichever is longer.

G-Q23) How does the operator follow-up and document integrity issues system-wide?

23) Comments: Adequate operating and maintenance records are maintained in the field and are maintained for at least the required time intervals. Official permanent records are kept in Houston.

Training

Operator errors result in pipeline incidents every year. We are trying to determine what processes operators have in place to address the training requirements and safety needs of the pipeline industry.

195.403 Training

G-Q24) Has the operator established and conducted a continuing training program to instruct operating and maintenance personnel?

R24) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q24) Headquarters				X
Q24) Field	X			
R24) Headquarters				X
R24) Field	X			

24) Comments: Training records indicate adequate training program established for operating and maintenance employees.

195.403 Cont'd

Q25) Does the operator review, at intervals not exceeding 15 months, but at least once each calendar year, the performance of their personnel in meeting the objectives of the training program?

R25) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q25) Headquarters				X
Q25) Field	X			
R25) Headquarters				X
R25) Field	X			

25) Comments: Combination of CBT training, annual PDR process - personal development review, conducted annually. Mockingbird computer based training introduced last year.

195.509(a) Operators must have a written qualification program by April 27, 2001.

G-Q26) Has the operator developed a written qualification program? Yes

R26) Associated Records? Headquarters specialize inspection to be conducted separately.

	Satisfactory	Needs Improvement	N/A	N/C
Q26) Headquarters			X	
Q26) Field			X	
R26) Headquarters			X	
R26) Field			X	

26) Comments: OQ Program is administered out of Houston. Two permanent employees.

Corrosion Control

Corrosion is a major cause of accidents and disbonded coating is often the leading factor. A check of close interval surveys for depressed areas may reveal disbonded coating. Pipe segments adjacent to locations where corrosion is found could easily develop corrosion because it may be subject to the same conditions. Additional preventive measures should be taken in these areas such as bell hole examinations and smart pigging activities. Review locations where clock-spring repairs were made to identify pipe segments that are subject to active corrosion.

195.414 Cathodic Protection

195.416 External Corrosion Control

195.418 Internal Corrosion Control

G-Q27) Does the company maintain a comprehensive corrosion control program?

R27) Associated Records (annual survey, rectifiers)?

	Satisfactory	Needs Improvement	N/A	N/C
Q27) Headquarters				X
Q27) Field	X			
R27) Headquarters				X
R27) Field	X			

27) Comments:

Utilize FIMMS (Facility Inspection Maintenance Management System) which developed detailed procedures for shorted casings, internal corrosion, close interval surveys, cp survey, etc.

G-Q28) Best Practice: Industrial Standards - RP0169, NACE

Is the company's corrosion program under the direction of a qualified person? (List the qualifications in the comment field.)

28) Comments: Yes. Jimmy Smith, NACE certified corrosion program steward for corrosion control, Longview, Tx.

195.402 Procedural Manual for Operation, Maintenance, and Emergencies - the 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.

G-Q29) Are corrosion control procedures in place and do they follow Part 195/NACE/industry standards?

R29) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q29) Headquarters				X
Q29) Field	X			
R29) Headquarters				X
R29) Field	X			

29) Comments: Yes - procedures adequately covered in FIMMS/O&M Manual.

195.402 cont'd

195.414 cont'd

195.416 cont'd

195.418 cont'd

G-Q30) How is the gathered information reviewed and analyzed to identify problem areas?

R30) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q30) Headquarters				X
Q30) Field	X			
R30) Headquarters				X
R30) Field	X			

30) Comments:

Any routine corrosion issues are handled by the corrosion technician who is authorized to take immediate corrective action - get backhoe, repair coating damage, etc.

195.401(b) Operation and Maintenance - the operator shall correct any condition that could adversely affect the safe operation of its pipeline within a reasonable time.

G-Q31) Under what conditions does the operator take prompt remedial action?

R31) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q31) Headquarters				X
Q31) Field	X			
R31) Headquarters				X
R31) Field	X			

31) Comments:

Any condition that impairs the continued integrity of the pipeline segment. Repairs to third party damage must be approved by Engineering as to type of repair (sleeve vs cut out). A company welder must be present during repair.

Q32) Best Practice:

What factors are considered in determining the need for and timing of pigging and close interval surveys?

32) Comments:

Pigging intervals are determined by factors such as pump efficiency to what is necessary to keep the pipeline relatively clean. A combination of coating condition and low potentials usually determines whether close interval surveys will be conducted.

Tanks

Inspection criteria relating to Tankage.

195.2 Definition - Breakout Tank means a tank used to (a) relieve surges in *hazardous liquid pipeline system* or (b) receive and store hazardous liquid transported by a pipeline for re-injection and continued transportation by pipeline.

G-Q33) Has the operator correctly identified/classified its tanks?

R33) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q33) Headquarters				X
Q33) Field	X			
R33) Headquarters				X
R33) Field	X			

33) Comments:

There are no NGL breakout tanks on the NGL pipeline. All other crude system breakout tanks have been identified. All tanks are floating roof type atmospheric tanks.

195.428(b) Over pressure safety devices - In case of relief valves on pressure breakout tanks containing highly volatile liquids, each operator shall test each valve at intervals not exceeding 5 years.

G-Q34) Does the operator ensure relief valves are tested?

R34) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q34) Headquarters			X	
Q34) Field			X	
R34) Headquarters			X	
R34) Field			X	

34) Comments: *Atmospheric tanks only - NO RV required!*

195.432 Breakout tanks - Each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, inspect each breakout tank (including atmospheric and pressure tanks).

G-Q35) Has the operator conducted the appropriate inspections? Does the operator use available industry codes and standards to uniformly establish maintenance and repair inspection criteria for the breakout tanks?

R35) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q35) Headquarters				X
Q35) Field	X			
R35) Headquarters				
R35) Field	X			X

35) Comments:

Breakout tank records indicate inspections have been conducted as required per API 653 standards.

G-36) Best Practice:

Are the breakout tanks equipped with high level alarms?

36) Comments:

Tanks are equipped with high level alarms.

Valves

It is important that isolation valves be in good working order and accessible when needed.

195.116 Valves

G-Q37) Has each valve been properly designed, marked, and tested?

R37) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q37) Headquarters				X
Q37) Field	X			
R37) Headquarters				X
R37) Field	X			

37) Comments:

Field inspections of valve nameplate data indicate valves have been adequately designed and marked.

195.260 Valve Locations - A valve must be installed at each of the following locations: on the suction and discharge end of a pump station; on each line entering or leaving a breakout tank area; along the pipeline that will minimize damage or pollution from accidental discharge; on each lateral takeoff from the trunk line; on each side of a water crossing that is more than 100 feet wide at high-water mark; and on each side of a reservoir holding water for human consumption.

G-Q38) Are mainline valves properly identified and located?

R38) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q38) Headquarters				X
Q38) Field	X			
R38) Headquarters				X
R38) Field	X			

38) Comments:

Valves have been install at all required locations and were necessary to minimize damage or pollution from an accidental spill.

195.420(a) Valve Maintenance - the operator shall maintain each valve that is necessary for the safe operation of its pipeline system in good working order at all times.

G-Q39) Does the operator maintain each valve that sees mainline pressure and flow in good working order?

R39) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q39) Headquarters				X
Q39) Field	X			
R39) Headquarters				X
R39) Field	X			

39) Comments:

Visually inspected and had operator partially operate randomly selected main line block valves. All were found in good working order.

195.420(b) Valve Maintenance - the operator shall, at intervals not exceeding 7 ½ months, but at least twice each calendar year, inspect each mainline valve to determine that it is functioning properly.

G-Q40) Does the operator inspect each mainline valve on a bi-annual 7 ½ month basis to determine that their valves are functioning properly?

R40) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q40) Headquarters				X
Q40) Field	X			
R40) Headquarters				
R40) Field	X			X

40) Comments:

Main line block valve records indicate inspections have been conducted twice each year - April & October.. Inspection procedure checks both the valve (operated manually) and the remote operator if installed.

195.420(c) Valve Maintenance - the operator shall provide protection for each valve from unauthorized operation and from vandalism.

G-Q41) Does the operator protect their valves from vandalism?

R41) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q41) Headquarters			X	
Q41) Field	X			
R41) Headquarters			X	
R41) Field	X			

41) Comments:

All valve site locations were fenced and locked. Valves were chained and locked.

195.404(c)(3) Maps and Records - Each operator shall maintain a record of their inspection of mainline valves for two years.

G-Q42) Does the operator maintain proper records for mainline valves?

R42) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q42) Headquarters			X	
Q42) Field	X			
R42) Headquarters			X	
R42) Field	X			

42) Comments:

Valve records are retained for at least the minimum two years.

G-Q43) Best Practice:

Are valves located to provide quick response for environmentally sensitive areas such as drinking water sources, national parks, etc.?

43) Comments:

Reviewed valve placement for all major bodies of water. All are valved on either side, and accessible for quick response.

G-Q44) Best Practice:

Are there any locations where special features, such as valve stem extension in flood plains, had to be incorporated because of difficulty in complying with the above? Are there any automatic or remotely controlled valves?

44) Comments:

No special provisions were noted during the inspection as to valve stem extensions. Remotely controlled valves are installed in system.

Patrol Program

An effective patrol program will combine information throughout the company to prevent damage to the pipeline and detect damage that has already occurred. Companies are encouraged to correlate information from a variety of sources such as comparing patrolling records with internal inspection data. Communication and areas of responsibility between patrol pilots and the personnel who follow-up and track the reports should be clearly defined so that both parties understand their role in preventing outside force damage.

195.402 Procedure Manual for Operations, Maintenance and Emergencies.

G-Q45) Does the operator have an adequate patrolling program ?

R45) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q45) Headquarters				X
Q45) Field	X			
R45) Headquarters				X
R45) Field	X			

45) Comments:

Records and procedure for patrolling pipeline found adequate. Beginning Oct 1, 2001, Mobil stopped using their own patrol planes and pilots. This aerial patrol function was contracted out to Barr Aviation. Aerial patrols are flown weekly.

Line Markers and Damage Prevention (Locating and Marking Pipelines)

It is critical that personnel who locate buried pipe in the course of their work are qualified and competent. Personnel performing this work may be operator or contract service company employees (line locate company, corrosion survey company, pipeline surveyors, etc.).

195.410(a) Line Markers - each operator shall place and maintain line markers over each buried pipeline.

G-Q46) Are markers located at public road crossing, railroad crossings, and in sufficient number along the remainder of each buried line?

R46) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q46) Headquarters				X
Q46) Field	X			
R46) Headquarters				X
R46) Field	X			

46) Comments:

No problems noted with line marker placement. Telephone numbers will remain the same until Control Center is moved to Houston from Dallas sometime during the 3rd quarter of 2002. Decals are used to indicate company name change.

195.402(c)(13) Procedural manual for operations, maintenance, and emergencies - Maintenance and normal operations - the manual must include procedures for periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

195.442(a) Damage prevention program - if the operator does not participate in a public service program, such as a one-call system, then the operator of a buried pipeline must carry out a written program to prevent damage to that pipeline from excavation activities.

G-Q47) Does the operator participate in a public service program? If not, does the operator evaluate their damage prevention procedures and take corrective action where deficiencies are found?

R47) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q47) Headquarters				X
Q47) Field	X			
R47) Headquarters				X
R47) Field	X			

47) Comments:

195.442(c) Damage prevention program - the operator must identify, on a current basis, persons who normally engage in excavation activities in the area in which the pipeline is located; notify the public and persons who normally engage in excavation activities of the damage prevention program; provide a means of receiving and recording notification of planned excavation activities; provide for actual notification of persons who give notice of their intent to excavate of the type of temporary marking to be provided and how to identify the markings; and provide inspection of excavation activities, if the operator believes the pipeline could be damaged by excavation activities.

195.442(c)(3) Damage prevention program - if the operator participates in a public service program, such as a qualified one-call system, then the operator must: provide a means of receiving and recording notification of planned excavation activities.

G-Q48) Does the operator have an adequate damage prevention program?

R48) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q48) Headquarters				X
Q48) Field	X			
R48) Headquarters				X
R48) Field	X			

48) Comments:

Recently made organization changes designating full time person to manage Mobil's damage prevention program, which includes meeting with public officials, participating in land use meetings, landowner and school liaison, and managing one call notices. Member of Ok and Tx one-call centers. Most of the pipeline system is using GPS coordinates to facilitate line locates.

**G-Q49) Best Practice: NPRM Qualification of Pipeline Personnel
Are trained/qualified personnel used for pipeline locating & marking?**

49) Comments:

Yes - covered by new OQ requirement.

**Liaison with Construction Project and Land-Use Officials
(Public Education)**

Encroachment around pipelines poses serious safety risks as third parties excavate in proximity to buried pipelines. A strong damage prevention program will provide advance notification of construction plans near the pipeline and will establish communication with the people involved in the project.

195.440 Public Education - each operator shall establish a continuing educational program to enable the public, appropriate government organizations, and persons engaged in excavation related activities to recognize a hazardous liquid or a carbon dioxide pipeline emergency and to report it to the operator or the fire, police, or other public officials.

G-Q50) How does the operator implement its continuing education program?

R50) Associated Records?

	Satisfactory	Needs Improvement	N/A	N/C
Q50) Headquarters				X
Q50) Field	X			
R50) Headquarters				X
R50) Field	X			

50) Comments:

Company sponsored meetings held with contractors and public officials. Mobil does not use the Pipeline Group.

G-51) Best Practice:

Does the operator's damage prevention program include pro-active liaison with public construction project and land-use officials, engineers, and contractors?

51) Comments:

Under Mobil's re-organization of their damage prevention program, they are now set up to maintain a pro-active liaison program with land-use contractors and engineering firms.

G-Q52) Best Practice:

Does the operator's damage prevention program include pro-active liaison with local school officials, where the pipeline traverses or is adjacent to, school property?

52) Comments:

Yes - have held meetings with local schools located near their pipeline.

G-Q53) Best Practice:

Does the operator have a liaison program that includes local developers and construction project officials?

53) Comments:

Yes - refer to previous comments.

**THE COMMON GROUND STUDY OF ONE CALL SYSTEMS
AND DAMAGE PREVENTION BEST PRACTICES**

G-Q54) Best Practice:

Has the operator reviewed the "Common Ground" Study of One Call Systems and Damage Prevention Best Practices?

54) Comments:

Yes - Mobil's one call team in Houston reviewed and developed a One-Call Procedures Manual incorporating "Common Ground" best practices.

G-Q55) Best Practice:

Has the operator compared and measured the best practices against existing damage prevention practices contained in the operator's damage prevention plan?

55) Comments:

Yes - see previous comment.

G-Q56) Best Practice:

Has the operator implemented any of the best practices in addition to their existing damage prevention activities subsequent to review of the Common Ground Study?

56) Comments:

Yes.

G-Q57) Best Practice:

Has the operator improved communication with other stakeholders in damage prevention as a result of the best practices?

57) Comments:

Yes.

Oil Pollution Act High Impact Inspection (49 CFR 194)

Field Verification of Facility Response Plan Information		Y	N	N/A
194.111	Is there a copy of the approved Facility Response Plan present? RSPA Tracking Number <u>0103</u> Approval Date <u>9/5/2000</u> [See Guidance OPA-1]	X		
194.107	Are the names and phone numbers on the notification list in the FRP current?[OPA-2]	X		
194.107	Is there written proof of a contract with the primary oil spill removal organization (OSRO)? [OPA-3]	X		
194.107	Are there complete records of the operator's oil spill exercise program? [OPA-4]	X		
194.117	Does the operator maintain records for spill response training (including Hazwoper training)? [OPA-5]	X		

OPA Inspection Guidance

OPA-1 - RSPA Tracking Number: This is also known as the "sequence number." It is a four-digit number that OPS HQ assigns to each facility response plan (FRP). If the operator does not know their sequence number, they should look on their copy of the FRP for the sequence number. Also, OPS HQ always puts the sequence number in every plan-related letter to operators.

Copy of approved FRP: Every oil pipeline operator must have an FRP approved by OPS. The operator should be able to produce their OPS plan approval letter. When OPS HQ approves a plan, the approval is valid for five years from the date of the approval letter.

OPA-2 - Names and phone numbers: Operators are required to keep the notification lists in their FRP current. The inspector should examine the notification list in the FRP and spot-check the accuracy of the names and phone numbers when they interview the operator. It is critical to check the Qualified Individual (QI) and Alternate QI data.

OPA-3 - Proof of OSRO contract: Operators whose FRP's state that they are relying on clean-up contractors for spill response are required to have contracts with the oil spill removal organizations (OSRO's) that they cite in the FRP. The inspector should ask to see documentation that the operator has a contract in place with the primary OSRO listed in the FRP.

OPA-4 - Exercise documentation: Operators are required to conduct a variety of spill response exercises under Part 194, and make their exercise records available to OPS for inspection. Inspectors should check to see if the operator lists the date, time, location and names of exercise participants. If the inspector has doubts about whether the operator's exercise documentation is accurate, it should be noted on the inspection form so that OPS HQ can follow up with the operator. The documentation should include annual spill management team tabletop exercises, quarterly internal notification drills, and annual response equipment deployment drills? The drill does not necessarily need to include a pipeline spill scenario, but should test the operator's personnel, equipment, resources, and response strategies needed for responding to a comparable pipeline spill.

OPA-5 - Training records: Operators are required to train their personnel to carry out their individual roles under the FRP. The inspector should spot-check the files of key personnel listed in the FRP to ensure that they have been trained to carry out their duties in a response. Special attention should be given to documenting the safety training required under OSHA's Hazwoper standard (29 CFR 1910.120). Each person involved in a spill response is required under 194.117 to have training commensurate with their duties.