			/ X
Name of Operator: Mobil Pipeline			Y
H.Q. Address: 800 Bell Houston, Texas 77002		PO E	s: cicana Unit # 3944 Box 618 cicana, Texas 75151-0618
Co. Official: A.K. Turner Phone No.: 713-656-2227 Fax No.: 713-656-2170 Emergency Phone No.: 214-742-3106		Activity Record ID#: Phone No.: 903- Fax No.: Emergency Phone No	654-5373 903-654-5357
Persons Interviewed	Tit	les	Phone No.
W. Lynn Hulse	Area Su	pervisor	903-654-5354
Mike Adams	Pipeline Sat	fety Davisor	713-656-3972
Bill White	Field Su	pervisor	903-654-5346
Larry Hawthorne	Field Regulat	ory Specialist	903-654-5346
Curtis Holt	Corrosion Te	ch. Corsicana	903-654-5325
Denny Wedgeworth	Corrosion Te	ch. Longview	903-236-8141
Jim Poole	Field Su	pervisor	903-236-8127
Company System Maps (copies for Region	n Files): Yes		
Unit Description: THIS UNIT CONSISTS OF 188 MILES O CORSICANA. 159 MILES OF 20" CRUE MILES OF 12" CRUDE KILGORE TO CO MILES OF PIPELINE ARE 451 IN 451 M	DE (#1) CORSICANA ' DRSICANA (EAST TE	TO THE TEXAS/ARK	ANSAS STATE LINE; AND 104
Portion of Unit Inspected (not required if a	covered in the PIM):	Jun A	und 9/3/04
For hazardous liquid operator inspe	ections, the attached CFR 195 during		ould be used in conjunction with 49

datis of inspection 7/19-7/23 8/16-8/19

Unless otherwise noted, all code references are to Part 195 S - Satisfactory U - Unsatisfactory N/A - Not Applicable N/C - Not Chec

		6		NUA	N
	CONVERSION TO SERVICE	· S .	0	N/A	N
.5	Has a written procedure been developed addressing all applicable requirements and followed?	x			

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note)

		SUBPART B - REPORTING PROCEDURES	s	U	N/A	N
.402(a) .402(c) (2)	.50	Procedures for gathering data needed for reporting accidents in a timely and effective manner. Accident report criteria, as detailed under 195.50. A release of 5 gals or more may be required to be reported.				2
	.52	Telephonically reporting accidents to NRC (800) 424-8802				2
	.54(a)	Accident Report - file as soon as practicable, but no later than 30 days after discovery				Z
	.54(b)	Supplemental report - required within 30 days of information change/addition				2
	.55	Safety-related conditions (SRC) - criteria				2
	.56(a)	SRC Report is required to be filed within five (5) working days of the determination and within ten (10) working days after discovery				3
	.56(b)	SCR Report requirements, including corrective actions (taken and planned)				y

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note) **Team O & M was done in Nov. 2002. Updates were reviewed.**

	SUBPA	RT C - PASSAGE OF INTERNAL INSPECTION DEVICE PROCEDURES	s	U	N/A	1
.402(c)/ .422		Each new pipeline or each section of a pipeline which pipe or components has been replaced must be designed and constructed to accommodate the passage of instrumented internal inspection devices that are applicable to this section	x			

Unless otherwise noted, all code references are to Part 195

S – Satisfactory U –

U – Unsatisfactory N/A – Not Applicable N/C – Not Checked

		SUBPART D - WELDING PROCEDURES	s	U	N/A	N/C
		welding requirements for pipe replaced or repaired in the course of pipeline maintenance is 422 and §195.200.				
.402(c)/	.214(a)	Welding must be performed by qualified welders using qualified welding procedures.				X
.422		Welding procedures must be qualified by destructive testing.				X
	.214(b)	Each welding procedure must be recorded in detail, including results of qualifying tests.				X
		Are welding procedures qualified in accordance with a standard that is accepted by the industry? (API 1104, ASME Boiler & Pressure Code - Section IX, or other)				x
	.222(a)	Welders must be qualified in accordance with Section 3 of the API Standard 1104 (18th Ed., 1994) or Section IX of the ASME Boiler and Pressure Vessel Code (1995), except that a welder qualified under an earlier edition than listed in §195.3 may weld, but may not requalify under that earlier edition.				x
	.222(b)	Welders may not weld with a particular welding process unless, within the preceding 6 calendar months, the welder has(1) Engaged in welding with that process; and (2) Had one weld tested and found acceptable under Section 6 of API 1104.				x
Ale		In the welding of repair sleeves and fittings, do the operator's procedures give consideration to:			k. j	3
		1. The use of low hydrogen welding rods.				18 ¹ 2
		2. Cooling rate of the weld.				
		3. Metallurgy of the materials being welded (weldability carbon equivalent).				1.1.1
		4. Proper support of the pipe in the ditch.				
.402(c)/	.226(a)	Arc burns must be repaired.				X
.422	.226(b)	Do arc burn repair procedures require verification of the removal of the metallurgical notch by nondestructive testing? (Ammon. Persulfate). Pipe must be removed for non-repairable notches.				X
	.226(c)	The ground wire may not be welded to the pipe/fitting being welded.				X

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

	WELI	DS: ACCEPTABILITY - NONDESTRUCTIVE TESTING PROCEDURES	S	U	N/A	N/C
.402(c)/ .422	.228 /.234	Do procedures require welds to be nondestructively tested to insure their acceptability according to Section 6 of API 1104 (18th) and per the requirements of §195.234 in regard to the number of welds to be tested?				x
1	.234(b)	Nondestructive testing of welds must be performed:				
		1. In accordance with written procedures for NDT				X
		2. By qualified personnel				X
		3. By a process that will indicate any defects that may affect the integrity of the weld				X
	.266	Records of the total number of girth welds and the number nondestructively tested, including the number rejected and the disposition of each rejected weld, must be maintained.				х

Unless otherwise noted, all code references are to Part 195

S – Satisfactory

U – Unsatisfactory

N/A – Not Applicable N/C – Not Checked

		WELDS: REPAIR or REMOVAL of DEFECT PROCEDURES	S	U	N/A	N/C
.402(c)/ .422	.230	Welds that are unacceptable (Section 6 API 1104) must be removed and/or repaired. See .228 and .230 for exceptions.				x

		SUBPART E - PRESSURE TESTING PROCEDURES	S	U	N/A	N/C
.402(c)/ .422	.302(a)	Each new pipeline system and each pipeline system in which pipe has been relocated or replaced, or that part of a pipeline system that has been relocated or replaced, must be pressure tested.				x
	.302(b)	Lines that have not been pressure tested per subpart E must be operated in accordance with Subpart E.				x
	.302(c)	Have/are the below listed pipelines (excluding converted lines and lines covered under the risk assessment option in §195.303) being pressure tested per subpart E; or, was the MOP established prior to 12/7/98, using the prescribed pressure in 195.406(a)(5) [80% of the 4 hour documented test pressure, or 80% of the 4 hour documented operating pressure]?				x
		- Interstate liquid lines constructed before 01/08/71 (excluding HVL onshore or low stress lines).				x
		- Interstate liquid offshore gathering lines constructed before 08-01-77 (excluding low stress lines).				x
		- Intrastate liquid lines constructed before 10/21/85 (excluding HVL onshore or low stress lines).				x
		- Carbon dioxide lines constructed before 07/12/91 (excluding rural production field distribution or low stress lines).				x
, L	.303	Procedures for the risk based alternative to pressure testing?				X
	.304	Test pressure must be maintained for at least 4 continuous hours at a pressure equal to 125 percent, or more, of the MOP. If not visually inspected during the test, at least an additional 4 hours at 110 percent of MOP is required.				x
		All pipe, all attached fittings, including components must be pressure tested in accordance with §195.302 .				x
	.305(b)	A component, other than pipe, that is the only item being replaced or added to the pipeline system need not be hydrostatically tested under paragraph (a) of this section if the manufacturer certifies that either: (1) The component was hydrostatically tested at the factory; or (2) The component was manufactured under a quality control system that ensures each component is at least equal in strength to a prototype that was hydrostatically tested at the factory.				x
Г	.306	Appropriate test medium				X
F		Pipe associated with tie-ins must be pressure tested.				X
F	.310(a)	Test records must be retained for useful life of the facility.				x
F	.310(b)	Does the record required by paragraph (a) of this section include:			· · ·	
	.310(b)(1)	Pressure recording charts.				X
	.310(b)(2)	Test instrument calibration data.				X
	.310(b)(3)	Name of the operator, person responsible, test company used, if any.				X
	.310(b)(4)	Date and time of the test.				X
-	.310(b)(5)	Minimum test pressure.				X
	.310(b)(6)	Test medium.				X

Unless otherwise noted, all code references are to Part 195

S – Satisfactory U –

U – Unsatisfactory N/A – N

N/A – Not Applicable N/C – Not Checked

		SUBPART E - PRESSURE TESTING PROCEDURES (Con't)	S	U	N/A	N/C
.402(c)/ .422	.310(b)(7)	Description of the facility tested and the test apparatus.				x
		Explanation of any pressure discontinuities, including test failures, that appear on the pressure recording charts.				х
	.310(b)(9)	Where elevation differences in the test section exceed 100 feet , a profile of the elevation over entire length of the test section must be included				x
	.310(b)(10)	Temperature of the test medium or pipe during the test period.				X

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

		SUBPART F - OPERATIONS & MAINTENANCE PROCEDURES	s	U	N/A	N/C
.402(a)	.402	a. Has the operator prepared a manual for normal operations & maintenance activities & handling abnormal operations & emergencies?				x
		b. Procedures for reviewing the manual at intervals not exceeding 15 months, but at least each calendar year?				x
		c. Appropriate parts must be kept at locations where O&M activities are conducted.				X

		MAINTENANCE & NORMAL OPERATION PROCEDURES	s	U	N/A	N/C
.402(a)	.402(c)	Written procedures must be followed to provide safety during maintenance and normal operations. Does the operator have procedures for:				
	.402(c)(4)	Has the operator determined which pipeline facilities are located in areas that would require an immediate response by the operator to prevent hazards to the public if the facilities failed or malfunctioned?			_	x
	.402 (c)(5)	Analyzing pipeline accidents to determine their causes?				Х
	.402(c)(6)	Minimizing the potential for hazards identified under paragraph $(c)(4)$ and minimizing the possibility of recurrence of accidents analyzed under paragraph $(c)(5)$?				x
	.402(c)(7)	Starting up and shutting down any part of the pipeline system in a manner designed to assure operation within limits prescribed by §195.406 , considering the hazardous liquid or carbon dioxide in transportation, variations in the altitude along the pipeline, and pressure monitoring and control devices?				x
	.402(c)(8)	In the case of a pipeline that is not equipped to fail safe monitoring from an attended location pipeline pressure during startup until steady state pressure and flow conditions are reached and during shut-in to assure operation within limits prescribed by §195.406 ?				х
	.402(c)(9)	In the case of facilities not equipped to fail safe that are identified under §195.402(c)(4) or that control receipt and delivery of hazardous liquid, detecting abnormal operating conditions by monitoring pressure, temperature, flow or other appropriate operational data and transmitting this data to an attended location?				x
	.402(c)(10)	Abandoning pipeline facilities, including safe disconnection from an operating pipeline system, purging of combustibles, and sealing abandoned environmental hazards.				х

STANDARD INSPECTION REPORT OF A LIQUID PIPELINE CARRIER U – Unsatisfactory N/C – Not Checked

Unless otherwise noted, all code references are to Part 195

S – Satisfactory

N/A – Not Applicable

MA	AINTENANCE & NORMAL OPERATION PROCEDURES (Con't)	S	U	N/A	N/C
	Reporting abandoned pipeline facilities under commercially navigable waterways per §195.59				X
.402(c)(11)	Minimizing the likelihood of accidental ignition of vapors in areas near facilities identified under paragraph (c)(4) of this section where the potential exists for the presence of flammable liquids or gases?				x
.402(c)(12)	Establishing and maintaining liaison with fire, police, and other appropriate public officials to learn the responsibility and resources of each hazardous liquid pipeline emergency.				x
.402(c)(13)	Periodically reviewing the work done by operator's personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found?				x
.402(c)(14)	Taking adequate precautions in excavated trenches to protect personnel from hazards of unsafe accumulations of vapor or gas, making available when needed at the excavation site, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line.				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

	ABNOR	MAL OPERATION PROCEDURES (CONTROL CENTER FUNCTION)	S	U	N/A	N/C
.402(a)	.402(d)	The O&M manual must contain written procedures to provide safety when operating design limits have been exceeded. Does the operator have procedures for:				
	.402(d)(1)	Responding to, investigating, and correcting the cause of:				-
		I. Unintended closure of valves or shutdowns?				X
		ii. An increase or decrease in pressure or flow rate outside normal operating limits?				X
		iii Loss of communications?				X
		iv. The operation of any safety device?				Х
		v. Any other malfunction of a component, deviation from normal operation, or personnel error which could cause a hazard to persons or property?				x
	.402(d)(2)	Checking variations from normal operation after abnormal operations have ended at sufficient critical locations in the system to determine continued integrity and safe operations?				x
	.402(d)(3)	Correcting variations from normal operation of pressure and flow equipment controls?				X
	.402(d)(4)	Does operating personnel notify responsible operator personnel where notice of an abnormal operation is received?				x
	.402(d)(5)	Periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found?				x

Unless otherwise noted, all code references are to Part 195

S – Satisfactory

U – Unsatisfactory N/A – Not Applicable

N/C – Not Checked

		EMERGENCY PROCEDURES	S	U	N/A	N/C
.402(a)	.402(e)	The O&M manual must include written procedures to provide safety when an emergency condition occurs. Does the operator have procedures for:				
	.402(e)(1)	Receiving, identifying, and classifying notices of events which need immediate response by the operator or fire, police, or other, and notifying appropriate operator's personnel for corrective action?				x
	.402(e)(2)	Making a prompt and effective response to a notice of each type of emergency, fire, explosion, accidental release of hazardous liquid, operational failure, natural disaster affecting the pipeline?				x
	.402(e)(3)	Making personnel, equipment, instruments, tools, and materials available at the scene of an emergency?				x
	.402(e)(4)	Taking action; such as emergency shutdown or pressure reduction, to minimize release of liquid at a failure site?				x
	.402(e)(5)	Controlling the release of liquid at the failure site?				X
	.402(e)(6)	Minimizing the public exposure and accidental ignition, evacuation, and halting traffic on roads, railroads, etc.?				x
	.402(e)(7)	Notifying fire, police, and others of hazardous liquid emergencies and preplanned responses including HVLs?				x
	.402(e)(8)	Determining extent and coverage of vapor cloud and hazardous areas of HVLs by using appropriate instruments?				x
	.402(e)(9)	Post accident review of employees activities to determine if procedures were effective and corrective action was taken?				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note):

Team O & M was done in Nov. 2002. Updates were reviewed.

ЕМ	ERGENC	Y RESPONSE TRAINING PROCEDURES (CONTROL CENTER & FIELD)	s	U	N/A	N/C
.402(a)		Each operator shall establish and conduct a written continuing training program to instruct operating and maintenance personnel to:		÷		
	.403(a)(1)	Carry out the emergency response procedures established under §195.402.				X
	.403(a)(2)	Know the characteristics and hazards of liquids or carbon dioxide transported, including in the case of HVL , flammability, of mixtures with air, odorless vapors, and water reactions.				x
	.403(a)(3)	Recognize conditions that are likely to cause emergencies; predict the consequences of malfunction or failures and take appropriate actions.				x
	.403(a)(4)	Take steps necessary to control any accidental release of hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity, or environmental damage.				X
	.403(a)(5)	Learn the potential causes, types, sizes, and consequences of fire and the appropriate use of portable fire extinguishers and other on-site fire control equipment, involving, where feasible, a simulated pipeline emergency condition.				x
	.402(f)	Instructions to enable O&M personnel to recognize and report potential safety related conditions.				x
	.403(b)	At intervals not exceeding 15 months, but at least once each calendar year:				
	.403(b)(1)	Review with personnel their performance in meeting the objectives of the emergency response training program				x
	.403(b)(2)	Make appropriate changes to the emergency response training program				Х
	.403(c)	Require and verify that supervisors maintain a thorough knowledge of the emergency response procedures for which they are responsible.				x

OPSForm-3 (195-80) Standard Inspection of a Liquid Pipeline Carrier (Rev: 02/26/2004 through Amdt. 195-80. Does not address yet to be issued Amdt. 195-79)

Unless otherwise noted, all code references are to Part 195

S – Satisfactory

U – Unsatisfactory N/A – Not Applicable

able N/C – Not Checked

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

		MAPS and RECORDS PROCEDURES	S	U	N/A	N/C
.402(a)	.402(c)(1)	Making construction records, maps, and operating history available as necessary for safe operation and maintenance.				x
	.404(a)	Each operator shall maintain current maps and records of its pipeline system that include at least the following information:				
	.404(a)(1)	Location and identification of the following facilities:	1			
		I. Breakout tanks				X
		ii. Pump stations				X
		iii. Scraper and sphere facilities				X
		iv. Pipeline valves				X
		v. Facilities to which §195.402(c)(9) applies				X
		vi. Rights-of-way				X
		vii. Safety devices to which §195.428 applies				X
	.404(a)(2)	All crossings of public roads, railroads, rivers, buried utilities and foreign pipelines.				X
	.404(a)(3)	The maximum operating pressure of each pipeline.				X
	.404(a)(4)	The diameter, grade, type, and nominal wall thickness of all pipe.				X
	.404(b)	Each operator shall maintain for at least 3 years daily operating records for the following:				
	.404(b)(1)	The discharge pressure at each pump station.				X
	.404(b)(2)	Any emergency or abnormal operation to which the procedures under §195.402 apply.				X
	.404(c)	Each operator shall maintain the following records for the periods specified:				
	.404(c)(1)	The date, location, and description of each repair made on the pipe and maintain it for the life of the pipe.				x
	.404(c)(2)	The date, location, and description of each repair made to parts of the pipeline system other than the pipe and maintain it for at least 1 year.				x
	.404(c)(3)	Each inspection and test required by Subpart F shall be maintained for at least 2 years, or until the next inspection or test is performed, whichever is longer.				x

Unless otherwise noted, all code references are to Part 195

S – Satisfactory

U – Unsatisfactory N/A – Not Applicable

able N/C – Not Checked

	MAXIM	IUM OPERATING PRESSURE PROCEDURES (MOP) - ALL SYSTEMS	s	U	N/A	N/C
.402(a)	.406(a)	Except for surge pressures and other variations from normal operations, the MOP may not exceed any of the following:				
	.406(a)(1)	The internal design pressure of the pipe determined by §195.106.				X
		The design pressure of any other component on the pipeline.				X
	.406(a)(3)	80% of the test pressure (Subpart E).				X
	.406(a)(4)	80% of the factory test pressure or of the prototype test pressure for any individual component.				X
	.406(a)(5)	80% of the test pressure or the highest operating pressure for a minimum of 4 hours for a pipeline that has not been tested under Subpart E .				x
	.406(b)	The pipeline may not be operated at a pressure that exceeds 110% of the MOP during surges or other variations from normal operations:				
		Adequate controls and protective equipment must be installed to prevent the pressure from exceeding 110% of the MOP .				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

		COMMUNICATION PROCEDURES (CONTROL CENTER)	S	U	N/A	N/C
.402(a)	.408(a)	Operator must have a communication system to provide for the transmission of information needed for the safe operation of its pipeline system.				x
	.408(b)	Does the communication system required by paragraph (a) include means for:				
	.408(b)(1)	Monitoring operational data as required by §195.402(c)(9).				X
		Receiving notices from operator personnel, the public, and others about abnormal or emergency conditions and initiating corrective actions.				x
	.408(b)(3)	Conducting two-way vocal communication between a control center and the scene of abnormal operations and emergencies.				x
	.408(b)(4)	Providing communication with fire, police, and other appropriate public officials during emergency conditions, including a natural disaster.				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note):

Team O & M was done in Nov. 2002. Updates were reviewed.

		LINE MARKER PROCEDURES	s	U	N/A	N/C
.402(a)	.410(a)	Line markers must be placed over each buried pipeline in accordance with the following:		- 22		
	.410(a)(1)	Located at each public road crossing, railroad crossing, and sufficient number along the remainder of each buried line so that its location is accurately known				x
	.410(a)(2)	Must have the correct characteristics and information				X
	.410(c)	Must be placed where pipelines are aboveground in areas that are accessible to the public				X

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

INSPEC	CTION R	IGHTS-of-WAY & CROSSINGS UNDER NAVIGABLE WATER PROCEDURES	S	U	N/A	N/C
.402(a)	.412(a)	Operator must inspect the right-of-way at intervals not exceeding 3 weeks, but at least 26 times each calendar year				X
	.412(b)	Operator must inspect each crossing under a navigable waterway to determine the crossing condition at intervals not exceeding 5 years .				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

	UND	ERWATER INSPECTION PROCEDURES of OFFSHORE PIPELINES	S	U	N/A	N/C
.402(a)	.413(b)	When the operator discovers that a pipeline it operates is exposed on the seabed or constitutes a hazard to navigation, does the operator:				
	.413(b)(2)	Promptly, but not later than 7 days after discovery, mark the location of the pipeline in accordance with 33 CFR Part 64 at each end of the pipeline segment and at intervals of not over 500 yards long, except that a pipeline segment less than 200 yards long need only be marked at the center.			x	
	.413(b)(3)	Within 6 months after discovery, or not later than November 1 of the following year if the 6 month period is after November 1 of that year the discovery is made, place the pipeline so that the top of the pipe is 36 inches below the seabed for normal excavation or 18 inches for rock excavation.			x	
	.57	Offshore pipeline condition reports - must be filed within 60 days after the inspections			X	

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): This unit has no offshore pipelines

		VALVE MAINTENANCE PROCEDURES	s	U	N/A	N/C
.402(a)	.420(a)	Operator must maintain each mainline valve that is necessary for the safe operation of its pipeline system in good working order at all times.				х
	.420(b)	Operator must inspect each mainline valve to determine that it is functioning properly at intervals not exceeding 71/2 months, but at least twice each calendar year.				х
	.420(c)	Operator must provide protection for each valve from unauthorized operation and from vandalism.				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): **Team O & M was done in Nov. 2002. Updates were reviewed.**

		PIPELINE REPAIR PROCEDURES	S	U	N/A	N/C
.402(a)	.422(a)	Operator must, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons and property.				х
	.422(b)	No operator may use any pipe, valve, or fitting, for replacement in repairing pipeline facilities, unless it is designed and constructed as required by this part.				X

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

,		PIPE MOVEMENT PROCEDURES	S	U	N/A	N/C
.402(a)	.424(a)	When moving any pipeline, the operator must reduce the pressure for the line segment involved to 50% of the MOP .				x
	.424(b)	For HVL lines joined by welding, the operator must:				X
	.424(b)(1)	Move the line when it does not contain HVL, unless impractical.				X
	.424(b)(2)	Have procedures under §195.402 containing precautions to protect the public.				X
	.424(b)(3)	Reduce the pressure for the line segment involved to the lower of 50% of the MOP or the lowest practical level that will maintain the HVL in a liquid state. (Minimum = V.P. + 50 psig)				x
	.424(c)	For HVL lines not joined by welding, the operator must:				X
	.424(c)(1)	Move the line when it does not contain HVL, unless impractical.				X
	.424(c)(2)	Have procedures under §195.402 containing precautions to protect the public.				X
	.424(c)(3)	Isolate the line to prevent flow of the HVL.				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

		SCRAPER and SPHERE FACILITY PROCEDURES	s	U	N/A	N/C
.402(a)	.426	Operator must have a relief device capable of safely relieving the pressure in the barrel before insertion or removal of scrapers or spheres.				x
		Operator must have a suitable device to indicate that pressure has been relieved, or a means to prevent insertion.				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note):

Team O & M was done in Nov. 2002. Updates were reviewed.

		OVERPRESSURE SAFETY DEVICE PROCEDURES	S	U	N/A	N/C
.402(a)	.428(a)	Operator must inspect and test each pressure limiting device, relief valve, pressure regulator, or other items of pressure control equipment to determine that it is functioning properly, in good mechanical condition, has adequate capacity, and is reliable.				x
		Operator must inspect and test overpressure safety devices at the following intervals:				
		1. Non-HVL pipelines at intervals not to exceed 15 months, but at least once each calendar year.	-			x
		2. HVL pipelines at intervals not to exceed 71/2 months, but at least twice each calendar year.				Х
	.428(b)	Operator must inspect and test relief valves on HVL breakout tanks at intervals not exceeding 5 years.				x
	.428(c)	Aboveground breakout tanks that are constructed or significantly altered according to API Standard 2510 after October 2, 2000, must have an overfill protection system installed according to the appropriate API. Tanks over 600 gallons (2271 liters) constructed or significantly altered after October 2, 2000, must have overfill protection according to API Recommended Practice 2350 unless operator noted in procedures manual (§195.402) why compliance with API RP 2350 is not necessary for the safety of a particular breakout tank.				x
	.428(d)	After October 2, 2000, the requirements of paragraphs (a) and (b) of this section for inspection and testing of pressure control equipment apply to the inspection and testing of overfill protection systems.				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

		FIREFIGHTING EQUIPMENT PROCEDURES	S	U	N/A	N/C
.402(a)	.430	Operator must maintain adequate firefighting equipment at each pump station and breakout tank areas.				x
		The equipment must be:				
i i		a. In proper operating condition at all times.				X
		b. Plainly marked so that its identity as firefighting equipment is clear.				X
		c. Located so that it is easily accessible during a fire.				X

	5 - A - A	BREAKOUT TANK PROCEDURES	S	U	N/A	N/C
.402(a)	.432(a)	Inspection of in-service breakout tanks. (annually/ 15mo) includes anhydrous ammonia and any other breakout tank that is not inspected per 432 (b) & (c); (Reference 195.1)				x
	.432(b)	Each operator shall inspect the physical integrity of in-service atmospheric and low-pressure steel aboveground breakout tanks according to section 4 of API Standard 653. However, if structural conditions prevent access to the tank bottom, the bottom integrity may be assessed according to a plan included in the operations and maintenance manual under §195.402(c)(3).				x
	.432(c)	Each operator shall inspect the physical integrity of in-service steel aboveground breakout tanks built to API Standard 2510 according to section 6 of API 510.				x

-	BREAKOUT TANK PROCEDURES (Con't)	S	U	N/A	N/C
	The intervals of inspection specified by documents referenced in paragraphs (b) and (c) of this section begin on May 3, 1999, or on the operator's last recorded date of the inspection, whichever is earlier.				x
	Note: For Break-out tank unit inspection, refer to Breakout Tank Form			-	

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

		SIGN PROCEDURES	S	U	N/A	N/C
.402(a)	.434	Operator must maintain signs visible to the public around each pumping station and breakout tank area.				X
		Signs must contain the name of the operator and a telephone number where the operator can be reached at all times.				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

	SECURITY of FACILITY PROCEDURES				N/A	N/C
.402(a)	.436	Operator must provide protection for each pumping station and breakout tank area and other exposed facilities from vandalism and unauthorized entry.				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

		SMOKING OR OPEN FLAME PROCEDURES	S	U	N/A	N/C
.402(a)	.438	Operator must prohibit smoking and open flames in each pump station and breakout tank area where there is the possibility of the presence of hazardous liquids or flammable vapors.				x

	Is there a continuing educational program to enable the public, government, persons engaged in			U	N/A	N/C
.402(a)	.440	Is there a continuing educational program to enable the public, government, persons engaged in excavation to recognize a hazardous liquid or carbon dioxide pipeline emergency and report it to the operator, fire, police, and others?				x
		Is the program conducted in English and other languages where appropriate?				X

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

		DAMAGE PREVENTION PROGRAM PROCEDURES	s	U	N/A	N/C
.402(a)	.442(a)	Is there a written program in place to prevent damage by excavation activities applicable to the operator's pipelines?				x
	.442(b)	Does the operator participate in a qualified One-Call program?				Х
	.442(c)(1)	Include the identity, on current a basis, of persons who normally engage in excavation activities in the area in which the pipeline is located.				X
	.442(c)(2)	Provide for notification to the public in the vicinity of the pipeline and actual notification to the persons identified in paragraph (c)(1) of this section of the following, as often as needed to make them aware of the damage prevention program:				
		I. The program's existence and purpose.				X
		ii. How to learn the location of underground pipelines before excavation activities are begun.				X
	.442(c)(3)	Provide a means of receiving and recording notification of planned excavation activities.				Х
	.442(c)(4)	If the operator has buried pipelines in the area of excavation activity, 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.				x
	.442(c)(5)	Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.				X
	.442(c)(6)	Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:			-	
		The inspection must be done as frequently as necessary during and after the activities to I. verify the integrity of the pipeline.				x
		ii. In the case of blasting, any inspection must include leakage surveys.				х

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

	CPM/LEAK DETECTION PROCEDURES				N/A	N/C
.402(a)	.444	If a CPM system is installed, does the operator's procedures for the Computational Pipeline Monitoring (CPM) leak detection system comply with API 1130 in operating, maintaining, testing, record keeping, and dispatching training?				x

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Team O & M was done in Nov. 2002. Updates were reviewed.

PIPELINE INTEGRITY MANAGEMENT IN HIGH CONSEQUENCE AREAS PROCEDURES	s	U	N/A N/C
§195.452 This form does not cover Liquid Pipeline Integrity Management Programs			

N/A N/C

S

U

§195.501-509

Refer to Operator Qualification Inspection Forms and Protocols (OPS web page)

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		SUBPART H - CORROSION CONTROL PROCEDURES	s	U	N/A	N/C
.402(a)	.555	Do procedures require that supervisors maintain a thorough knowledge of that portion of the	X			
		corrosion control procedures for which they are responsible for insuring compliance.				
	.557	Except bottoms of aboveground breakout tanks, each buried or submerged pipeline must have an external coating for external corrosion control if the pipeline is :	Х			
		 a) constructed, relocated, replaced, or otherwise changed after the applicable dates : 3/31/70 - interstate pipelines excluding low stress 7/31/77 -interstate offshore gathering excluding low stress 10/20/85-intrastate pipeline excluding low stress 7/11/91- carbon dioxide pipelines 8/10/94 - low stress pipelines NOTE: This does not include the movement of pipe under 195.424 	x			
		 b) Converted under 195.5 and 1) Has an external coating that substantially meets 195.559 before the pipeline is placed in service or; 	x			
		2) Is a segment that is relocated, replaced, or substantially altered.	Х			
	.559	 Coating Materials; Coating material for external corrosion control must: a. Be designed to mitigate corrosion of the buried or submerged pipeline; b. Have sufficient adhesion to the metal surface to prevent under film migration of moisture; c. Be sufficiently ductile to resists cracking; d. Have enough strength to resist damage due to handling and soil stress; e. Support any supplemental cathodic protection; and f. If the coating is an insulating type, have low moisture absorption and provide high electrical resistance. 	х			
	.561	a. All external pipe coatings required under 195.557 must be inspected just prior to lowering the pipe in the ditch or submerging the pipe.	х			
		b. All coating damage discovered must be repaired.	Х			
	.563	a. Is cathodic protection applied to pipelines that have been subjected to the conditions listed in 195.557(a) within one (1) year?	х			
		b. Each buried or submerged pipeline converted under 195.5 must have cathodic protection if the pipeline-			12	ana lina ana
		 Has cathodic protection that substantially meets 195.571 before the pipeline is placed in service, or 	Х			
		2) Is a segment that is relocated, replaced, or substantially altered.	Х			
		c. All other buried or submerged pipelines that have an effective external coating must have cathodic protection.	х			
		d. Bare pipelines, breakout tank areas, and buried pumping station piping must have cathodic protection in places where previous editions of this part required cathodic protection as a result of electrical inspections.	x			
		e. Unprotected pipe must have cathodic protection if required by 195.573(b).	X			
	.567	Test leads installation and maintenance	X			

		SUBPART H - CORROSION CONTROL PROCEDURES (Con't)	S	U	N/A	N/0
.402(a)	.569	Examination of Exposed Portions of Buried Pipelines	X			
ſ		Cathodic protection must comply with one or more of the applicable criteria and other				
		considerations for cathodic protection contained in paragraphs 6.2 and 6.3 of NACE Standard	Х			
	.571	RP0169-96 (incorporated by reference)	V			⊢
	.573	a. (1) Pipe to soil monitoring (annually / 15months)	X			
		Separately protected short sections of bare ineffectively coated pipelines (every 3 years not to exceed 39 months)	X			
		(2) Before 12/29/2003 or not more than 2 years after cathodic protection installed, whichever comes later, identify the circumstances in which a close-interval survey or comparable technology is practicable and necessary to accomplish the objectives of paragraph 10.1.1.3 of NACE RP0169-96.	x			
		b. Unprotected buried or submerged pipe must be evaluated and cathodically protected in areas in which active corrosion is found as follows;				27. 28.
		 Determine areas of active corrosion by electrical survey, or where electrical survey is impractical, by other means that include review of analysis of leak repair and inspection records, corrosion monitoring records, exposed pipe inspection records, and the pipe environment. 	x			
		2) Before 12/29/2003 - at least once every 5 years not to exceed 63 months.	X			<u> </u>
		Beginning 12/29/2003 - at least once every 3 years not to exceed 39 months.	X			
		 c. Rectifiers, Reverse Current Switches, Diodes, Interference Bonds whose failure would jeopardize structural protection - at least 6 times each year, intervals not to exceed 2½ mos. 	x			
F		e. Any deficiencies identified in corrosion control must be corrected as required by 195.401(b).	X			
ł	.575	Are there adequate provisions for electrical isolations?	X			
	.577	a. For pipelines exposed to stray currents, is there a program to minimize the detrimental effects?	x			
ŀ	.579	 b. Design & install CP systems to minimize effects on adjacent metallic structures. a. For pipelines that transport any hazardous liquid or carbon dioxide that would corrode the pipe, are corrosive effects investigated and adequate steps taken? 	x			
		 b. Internal Corrosion - Inhibitors - do procedures show that they are to be used in conjunction with coupons or other monitoring equipment to determine the effectiveness of the inhibitors in mitigating internal corrosion 	x			
		Coupons or other monitoring equipment must be examined at least 2 times each year, not to exceed 7 ½ months.	x			
		c. Whenever pipe is removed from a pipeline, the internal surface of the pipe must be inspected for evidence of corrosion as well as the adjacent pipe.	x			
	.581	Are pipelines protected against Atmospheric Corrosion using required coating material? (See exception to this statement)	x			
	.583	Atmospheric corrosion monitoring -		180		
-		ONSHORE - At least once every 3 years but at intervals not exceeding 39 months.	X			
		OFFSHORE - At least once each year, but at intervals not exceeding 15 months.	X			
	.585	a. Are procedures in place and are they followed to either reduce the MOP , or repair/replace pipe if general corrosion has reduced the wall thickness?	х			
		b. Are procedures in place and are they followed to either reduce the MOP , or repair/replace if localized corrosion has reduced the wall thickness?	x			
	.587	Are applicable methods used in determining the strength of corroded pipe (ASME B-31G, RSTRENG)	x			
Γ	.589	Corrosion Control Records Retention (Some are required for 5 yrs; Some are for the service life)	Х			

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Updates were reviewed. Operator complies with corrosion rule changes effective 12/01

Best Practice:

What process does the Operator have to address Alert Notices?

Comments: Compliance Coordinator is responsible to keep proper personnel abreast of new alerts, code changes, bulletins and current regulations

Best Practice: Stress Corrosion Cracking

Pipeline Safety Advisory Bulletin ADB-03-05 - October 8, 2003 Reference <u>http://www.gpoaccess.gov/fr/advanced.html</u> **fr06oc03N Pipeline** Safety: Stress Corrosion Cracking (SCC) Threat to Gas and Liquid Pipelines).

Is the operator aware of the bulletin, and is the operator reviewing their system for the potential of SCC? $Y/N \ \underline{Y}$

Best Practices: Damage Prevention

(If operator's damage prevention best practices answers have not changed since the previous inspection and are noted as such, then completion of the below 7 questions is not required).

1. Does the operator's damage prevention program include actions to protect their facilities when directional drilling or boring operations are conducted in proximity to the facilities? Y/N \underline{Y}

2. Does the operator's damage prevention program include pro-active liaison with public construction project and land-use officials, engineers, and contractors? $Y/N \ \underline{Y}$

3. Does the operator's damage prevention program include proactive liaison with local school officials, where transmission pipelines traverse or are adjacent to school property? $Y/N \quad \underline{Y}$

4. Has the operator reviewed the "Common Ground" Study of One Call Systems and Damage Prevention Best Practices? Y/N Y

5. Has the operator compared and measured the best practices against existing damage prevention practices contained in the operator's damage prevention plan? Y/N \underline{Y}

6. 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? Y/N \underline{Y}

7. Has the operator improved communication with other stakeholders in damage prevention as a result of the best practices? Y/N Y

Damage Prevention Comments:

Unless otherwise noted, all code references are to Part 195

S - Satisfactory U - Unsatisfactory N/A - Not Applicable N/C - Not Checked

	PART 195 - FIELD REVIEW	S	U	N/A	N/C
.120	Have new pipelines, or pipeline sections of which pipe or components have been replaced, been designed and constructed to accommodate smart pigs ? (See exceptions under (b) and (c))	X			
.262	.262 Pumping Stations				
.262	Station Safety Devices	X			
.308	Pre-pressure Testing Pipe - Marking and Inventory	X			
.403	Emergency Response Training	Х			
.410	.410 Right-of-Way Markers				
.412	.412 River Crossings				
.557	.557 Cathodic Protection (test station readings, other locations to ensure adequate CP) levels)				
.573	.573 Pipeline Components Exposed to the Atmosphere				
.573	Rectifiers, Reverse Current Switches, Diodes, Interference Bonds	X			
.420	.420 Valve Maintenance				
.420	Valve Protection from Unauthorized Operation and Vandalism	X			
.426	Scraper and Sphere Facilities and Launchers	X			
.428	Pressure Limiting Devices	X			
.428	Relief Valves - Location - Pressure Settings - Maintenance	X			
.428	Pressure Controllers	X			
.430	Fire Fighting Equipment	X			
.432	Breakout Tanks	X	-		
.434	.434 Signs - Pumping Stations - Breakout Tanks				
.436	Security - Pumping Stations - Breakout Tanks	X			
.438	No Smoking Signs	X		1	
.501509	Operator Qualification Questions - See Attachment 3	x			

Unless otherwise noted, all code references are to Part 195

S - Satisfactory U - Unsatisfactory N/A - Not Applicable N/C - Not Checked

	S	U	N/A	N/C	
	CONVERSION to SERVICE				N
.5(a)(1)	Testing to Verify MOP (ASME <appendix n)<="" th=""><th>X</th><th></th><th></th><th></th></appendix>	X			
.5(a)(2)	Inspection of Pipeline Right-of-Way	X			
.5(c)	Pipeline Records (Life of System)	X			
	Pipeline Investigations	X			
	Pipeline Testing	X			
	Pipeline Repairs	X			
	Pipeline Replacements	X			
	Pipeline Alterations	X			
	REPORTING			4.11	
.49	.49 Annual Report (DOT form RSPA F7000-1.1Beginning no later than June 15, 2005)				
.52	Telephonic Reports to NRC (800-424-8802)	X			
.54(a)	Written Accident Reports (DOT Form 7000-1)	X			
.54 (b)	Supplemental Accident Reports (DOT Form 7000-1)	X			
.56	Safety Related Conditions	X			
.57	Offshore Pipeline Condition Reports	X			
.59	Abandoned Underwater Facility Reports	X			
	CONSTRUCTION				t av
.204	Construction Inspector Training/Qualification	X			
.214(b)	Test Results to Qualify Welding Procedures	X			
.222	Welder Qualification	X			
.234(b)	Nondestructive Technician Qualification	X			
.589	Cathodic Protection	X			
.266	Construction Records	X			
.266(a)	Total Number of Girth Welds	X			
	Number of Welds Inspected by NDT	X			
	Number of Welds Rejected	X			
	Disposition of each Weld Rejected	X			
.266(b)	Amount, Location, Cover of each Size of Pipe Installed	X			
.266(c)	Location of each Crossing with another Pipeline	X			
.266(d)	Location of each buried Utility Crossing	X			
.266(e)	Location of Overhead Crossings	X			
	Location of each Valve and Test Station	X			
()	PRESSURE TESTING	1.1			
.310	Pipeline Test Record	X			
.305(b)	Manufacturer Testing of Components	x			
		x			
.308	Records of Pre-tested Pipe				

Unless otherwise noted, all code references are to Part 195

S - Satisfactory U - Unsatisfactory N/A - Not Applicable N/C - Not Checked

PART 195 - RECORDS REVIEW (Con't.)					N/C
	OPERATION & MAINTENANCE				
.402(a)	Annual Review of O&M Manual (1 per yr/15 months)	X			
.402(c)(4)	Determination of Areas requiring immediate response for Failures or Malfunctions	X			
.402(c)(10)	Abandonment of Facilities	X			
.402(c)(12)	Establishment/Maintaining liaison with Fire, Police, and other Public Officials	X			
	Review of work Performed by Personnel (periodically)	X			
.402(d)(1)	Response to Abnormal Pipeline Operations	X			
	Review of Personnel Response to Abnormal Operations	X			
	Notices of Emergencies	X			
.402(e)(7)		X			
	Post Accident Reviews	x			
.403(a)	Emergency Response Personnel Training Program	X			
.403(b)	Review of Personnel Perform., Emergency Response Program Changes (1 per yr/15 months)	X			
.403(c)	Verification of Supervisor Knowledge - Emergency Response Procedures	X			
.404(a)(1)	Maps or Records of Pipeline System	X			
	Maps/Records of Crossings of Roads, Railroads, Rivers, Utilities and Pipelines	X			
	MOP of each Pipeline	X			
	Pipeline Specifications	X			
	Pump Station Daily Discharge Pressure (maintain for at least 3yrs)	X			
	Abnormal Operations (§195.402) (maintain for at least 3yrs)	X			
dente de la companya	Pipe Repairs (maintain for useful pipe life)	X			
	Repairs to Parts of the System other than pipe (maintain for at least 1 yr)	X			
	Required inspection and test records (maintain 2 yrs or next test/inspection)	X			
	Establishing the MOP	X			
.400(a)	Inspection of the ROW	x			
	Inspection of Underwater Crossings of Navigable Waterways			x	
	Inspection of Pipelines in Gulf of Mexico			x	
	Inspection of Mainline Valves	X			
.428(a)	Insp. of Overpress. Safety Devices (1 per yr/15 months non-hvl; 2 per yr/7 ¹ / ₂ months hvl)	X			
.428(b)	Inspection of Relief Devices on HVL Tanks (intervals NTE 5 yrs).	X			
.428(d)	Inspection of Overfill Systems (1 per yr/15 months non-hvl; 2 per yr/71/2 months hvl)	X			
.430	Inspection of Fire Fighting Equipment	X			
.432	Inspection of Breakout Tanks (1 per yr/15 months or per API 510 or 653).	X			
.440	Public Education	X			

Unless otherwise noted, all code references are to Part 195

S - Satisfactory U - Unsatisfactory N/A - Not Applicable N/C - Not Checked

	PART 195 - RECORDS REVIEW (Con't.)						
	DAMAGE PREVENTION PROGRAM						
.442(c)(1)							
.442(c)(2)	Notification of Public/Excavators	X					
.442(c)(3)	Notifications of planned excavations. (One -Call Records)	X					
<u> </u>	CORROSION CONTROL						
.569	Inspection of Exposed Pipelines (External Corrosion)	X					
.573(a)	External Corrosion Control - Protected Pipelines	X					
.573(b)	External Corrosion Control - Unprotected Pipelines	X					
.573(c)	Interference Bonds, reverse current switches, diodes, rectifiers	X					
.573(d)	External Corrosion Control - Bottom of Breakout Tanks	X					
.579(a)	Corrosive effect investigation	x					
.579(b)	Examination of Coupons/Other Types of Internal Corrosion Monitoring Equipment	X					
.579(c)	Inspection of Removed Pipe for Internal Corrosion	X					
.583(a)	Atmos. Corr. Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore)	X					
.589	Cathodic Protection (Maps showing anode location, test stations, CP systems, etc)	X					

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note): Operator has no navigable or offshore operations in this unit

	Field Verification of Facility Response Plan Information					
	Is there a copy of the approved Facility Response Plan present? [See Guidance OPA-1]	X				
194.111	RSPA Tracking Number: 103 Approval Date: 03/09/04	-				
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				

Oil Pollution Act High Impact Inspection (49 CFR 194)

Comments (If any of the above is marked U, N/A, or N/C, please indicate why, either in this box or in a referenced note):

OPA Inspection Guidance

<u>OPA-1</u> - **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. If the operator is a new operator without a plan, the unit has a new owner, or the unit has new facilities not incorporated into the existing OPA-90 Plan, the answer is NO. Direct the operator to contact L.E. Herrick, 202-366-5523.

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.

<u>OPA-2</u> - 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.

<u>OPA-3</u> - 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.

<u>OPA-4</u> - 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.

<u>OPA-5</u> - 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.

<u>Attachment 1</u> <u>SCADA Liquid Worksheet</u>

The topics on this worksheet regard general SCADA functionality. A more thorough SCADA evaluation may be warranted based on the results of this worksheet or prompts by other events.

1. Pipeline Safety Advisory Bulletins (reference http://www.gpoaccess.gov/fr/advanced.html)

Review the following with the operator:

• July 7, 1999 Advisory Bulletin ADB-99-03 (Ref.fr16jy99N Potential Service Interruptions in Supervisory Control and Data Acquisition Systems) - discuss SCADA system performance.

• December 16, 2003 Advisory Bulletin ADB-03-09 (Ref. fr23de03N Pipeline Safety: Potential Service Disruptions in

Supervisory Control and Data Acquisition Systems) - discuss consideration of possible SCADA system disruptions caused by system maintenance or upgrade.

Comments: Operator is aware of all bulletins and has a adequate program to deal with disruptions

Operators may choose to use SCADA, or other forms of automation, to comply with the Pipeline Safety Regulations. The following code subsections could apply if a SCADA system is utilized:

2. 195.402(d)(1)(iii) - Loss of communications.

- Off-site Back-up Center
- Data transfer to redundant or off-site processors
- Battery and/or Emergency Generator
- Redundant data communications paths, automatic restoration or manual?
- Data Reduction & Archiving
- Indication of stale, forced or manually overridden data, or system lock-up
- Operating practices during data communications outages

Comments: Complies with the above

3. §195.404 - Pump station discharge pressure records.

- Discharge Pressure records in SCADA or at field locations?
- Data Reduction & Archiving
- Data acquisition frequency

Comments: Complies with the above

<u>Attachment 1</u> <u>SCADA Liquid Worksheet</u>

4. §195.404 Maps and records.

(a) Each operator shall maintain current maps and records of its pipeline systems that include at least the following information:

- (1) Location and identification of the following pipeline facilities:
- (I) Breakout tanks;
- (ii) Pump stations;
- (iii) Scraper and sphere facilities;
- (iv) Pipeline valves;
- (v) Facilities to which §195.402(c) (9) applies;
- (vii) Safety devices to which §195.428 applies.

(b)(2) Any emergency or abnormal operation to which the procedures under §195.402 apply.

- Ensure SCADA screens/status board are updated to reflect current pipeline configurations
- Ensure pipeline safety parameters are current (i.e., MOP, alarm set points, etc.)
- Review any emergency or abnormal operating condition or schedule deviation records generated by the SCADA system (alarm logs, trending data, etc.). Compare abnormal operating conditions noted in the SCADA data with the operator's report and reporting procedures as related to those abnormal operating conditions.
- Data Reduction & Archiving
- Data acquisition frequency

Comments: Complies with the above

5. §195.408 - Communications.

(a) Communication system must provide for the transmission of information needed for the safe operation of its pipeline system

(b)(1) Monitoring operational data as required by \$195.402(c)(9)

- Status Monitoring
- Alarm Thresholds
- Alarm Management
- Event Log
- Over-short Reports
- Maintaining pressures within limits described in §195.406 Maximum Operating Pressure

Comments: Complies with the above

6. §195.134 & 444 - Computational Pipeline Monitoring (CPM) leak detection design & maintenance

- Over-Short Reports
- Must Comply with API 1130 requirements in operating, maintaining, testing, record-keeping, and dispatcher training.

<u>Attachment 1</u> SCADA Liquid Worksheet

Comments: Operator does not rely on CPM for total leak detection

- 7. §195.420 & .428 Testing of applicable SCADA controlled valves, safety devices, and overfill systems functionality.
 - Frequency of testing
 - Inclusion of SCADA component in the tests

Comments: Complies with the above

<u>Attachment 2</u> <u>Internal Corrosion Worksheet - Liquid Pipelines</u>

NOTE: Refer to OPS Enforcement Manual, Code Compliance Guidelines PART 195, SUBPART H: CORROSION CONTROL for Internal Corrosion

- 1. Are internal corrosion control procedures established? Y: Y N:
- Has the operator investigated the corrosive effect of the hazardous liquid or carbon dioxide; and has he taken adequate steps to mitigate internal corrosion? Y: Y N: _____
- 3. Does operator inject corrosion inhibitor to mitigate internal corrosion? Y: \underline{Y} N: _____
- 4. Each coupon utilized or other means of monitoring internal corrosion must be checked two times each calendar year, but with interval not exceeding 7 1/2 months. Y: Y N: _____
- 5. Does operator control internal corrosion effects caused by water by dehydration and water-soluble inhibitors? Y: Y N:
- Does the operator have the means to monitor free oxygen introduced into the transported commodity, which may adversely affect breakout tanks or pipelines? Y: <u>Y</u> N: _____
- Does the operator pig their pipelines to remove any water or sludge build-ups (sample analysis should be performed)?
 Y: Y N: _____
- Whenever pipe is removed (including coupons removed during hot taps), is it examined for evidence of internal corrosion?
 Y: Y N: _____
- 9. Does the operator track internal corrosion and take corrective action to prevent recurrence? Y: \underline{Y} N: _____
- 10. Which method does the operator utilize to determine the effectiveness of its corrosion inhibition program?
 - X Gas and Fluid analysis
 - $\underline{\mathbf{X}}$ Rates of pipeline corrosion as determined by coupons
 - $\underline{\mathbf{X}}$ Solids removed from the system
 - $\underline{\mathbf{X}}$ Analysis of inhibitor samples from the pipeline
 - X Magnetic and electronic device (pigs)

____ Other

11. Is the inhibitor compatible with the product being transported? Y: Y N: ____ N/A: ____

Comments:

<u>Attachment 3</u> Operator Qualification Worksheet

The following questions are to be used by the inspector to provide information in determining a need for a more intensive OQ field inspection.

1. Do the supervisors know what actions to take, as required by the operator's OQ program, when an individual's performance of a covered task may have contributed to an accident?

Comments: (If Unsatisfactory please indicate why, either in this box or in a referenced note): **Yes**

2. Do the supervisors know what actions to take, as required by the operator's OQ program, when an individual is identified that may no longer be qualified to perform a covered task?

Comments: (If Unsatisfactory please indicate why, either in this box or in a referenced note): **Yes**

3. Do the individuals performing covered tasks know how to recognize and react to AOC's that may be encountered while performing tasks?

Comments: (If Unsatisfactory please indicate why, either in this box or in a referenced note): **Yes**

4. Are the employee and/or contractor individuals observed performing covered tasks qualified per OQ program requirements? (Documentation may be a hard copy or database records available at the job site or local office).

Comments: (If Unsatisfactory please indicate why, either in this box or in a referenced note): **Yes**

5. Are the individuals who are observed performing covered tasks adhering to operator's procedures?

Comments: (If Unsatisfactory please indicate why, either in this box or in a referenced note): **Yes**

Name of Operator: M	Iobil Pipeline			
H.Q. Address: 800 Bell Houston, Texas 77002			System/Unit Address Corsicana Unit # 394 PO Box 618 Corsicana, Texas 751	4
Co. Official:	A.K. Turner		Activity Record ID#:	109429
Phone No.:	713-656-2227		Phone No.:	903-654-5300
Fax No.:	713-656-2170		Fax No.:	903-654-5302
Emergency Phone No.:	214-742-3106		Emergency Phone No	.: 214-742-3106
Persons Interv	iewed	Titles		Phone No.
W. Lynn Hulse		Area Supervisor		903-654-5354
Mike Adams		Pipeline Safety Director		713-656-3972
Bill White		Field Supervisor		903-654-5346
Larry Hawthorne		Field Regulatory Special	ist	903-654-5346
Curtis Holt		Corrosion Tech. Corsica	na	903-654-5325
Denny Wedgeworth		Corrision Tech. Longvie	w	903-236-8141
Jim Poole		Field Supervisor		903-236-8127
Company System Maps (conies for Region	Files): Yes		

BREAKOUT TANK INSPECTION FORM

Comments:

During the week's of July 19th and August 16th I performed a standard inspection of Mobil Pipeline Corsicana Unit # 3944 which included 4 breakout tanks at the Ringold station. Data is included in this report.

Jun Cured 9/2/0x

For hazardous liquid operator inspections, the attached evaluation form should be used in conjunction with 49 CFR 195 during OPS inspections.

BREAKOUT TANK INSPECTION FORM

TANK DATA

		1	2	3	4	5	6
(A)	FACILITY NAME	Ringold	Ringold	Rinbgold	Ringold		
(B)	TANK #	2702	2720	2703	2704		
(C)	CONSTRUCTION DATE / API STANDARD	1953	1956	1953	1953	-	
(D)	CONST. TYPE	W	W	w	w		
(E)	CAPACITY (BBL)	118,427	131,163	118,427	120,664		
(F)	INTERNAL LINING? (Y/N)	N	N	N	N		
(G)	HT.(FT)	47.11	47.80	47.11	48.00		
(H)	MAX. FILL HT. (FT)	47.11	47.80	47.11	48.00		
(I)	DIA (FT)	134.00	134.00	134.00	134.00		
(J)	ROOF TYPE	FR	FR	FR	FR		
(K)	PRODUCTS	Crude	Crude	Crude	Crude		
(L)	TYPE OF VOLUMETRIC ALARMS	H/HH	н/нн	H/HH	Н/НН		
(M)	DIKE VOLUME (BBL)						
(N)	DATE INTERNAL INSPECTION		-				
(0)	DATE REPAIRED						
(P)	DATE API 653 APPLIED						
(Q)	CATHODIC PROTECTION TYPE	R	R	R .	R		

Legend:

(D):

(J):

(W) Welded; (R) Riveted; (B) Bolted
(EF) External Floater; (IF) Internal Floater; (F) Fixed
(R) Refined; (C) Crude; (H) Highly Volatile Liquid; (O) Other
(H) High; (HH) High-High; (O) Overfill; (OTH) Other
Most Recent Date (K):

(L):

(N):

Most Recent Date (O):

(Q): (A) Anodic; (R) Rectified; (N) None - Document why not needed.

IOCS Inspection Summary Activity ID: 109429							pus (?
Activity ID 109429			T o Dates - 08/19/2004	Status: INC	Result:	AFO / Total .00	Days: 9.00
ARN	Representative: OLD,JIM	Jun	ame	eel	9]	3/04	
Comments: THERE WERE NO PROBABLE VIOLATIONS OBSERVED DURING THIS INSPECTION. PROCEDURES WERE ADEQUATE. MAINTENANCE RECORDS WERE KEPT ACCORDING TO CODE. FOUND SEVERAL AREAS OF ROW THAT NEEDS MAINTENANCE. THE ROW FROM TRINITY BLVD. TO NORTH SIDE OF TRINITY RIVER IN FORT WORTH, TEXAS (DENSILY POPULATED) NEEDS IMMEDIATE ATTENTION. SEVERAL AREAS ALONG THE 263 MILES OF IDLE LINES ARE IN NEED OF MAINTENANCE. OPERATOR ADVISED THEY HAD A PROGRAM IN PROGRESS TO ADDRESS THIS CONCERN. Portion Inspected:							
ENTIRE U WAY'S, L STATION ALSO RE REVIEWE WERE IN CONDITIO	JNIT WAS INSPECTED. I INE MARKERS, SIGNS, (S, RECTIFIERS, SHORT VIEWED. NO PRIOR CO ED. THE HARD COPY FIL CLUDED IN THIS UNIT I DNS AT THE FOLLOWIN 0, 106.5, AND 123.5.	OVERPRESSURE DEVI ED CASINGS, OVERHE MPLIANCE ISSUES NE LE WAS CHECKED FOF NSPECTION TANK # 27	CES, ALL PUMF AD PIPE SPANS EDED TO BE AL NFORMATION 02, 2703, 2704 /	P STATIONS, S, EXPOSED DRESSED F I. 4 BREAKO AND 2720. O	NUMEROUS PIPE IN DITC OR THIS INS UT TANKS LO BSERVED ML	ROAD CROSSIN CHES. SCADA SY PECTION. IOCS OCATED AT RING V, CP READINGS	GS, CP /STEM WAS & PIPES WERE GOLD TEXAS & AND ROW
1	NK / YEAR 31 2004						
Assignments:							
Name	Region	Task(s)		From / To D	ates	AFO/Total Days	
ARNOLD.	JIM SW	INSPECTION	07	/19/2004	08/19/2004	.00 9.00	
STANDARD INSPECTION OF MOBIL PIPELINE UNIT # 3944. THIS INSPECTION CONSISTED OF THE CORSICANA, TX TO WICHITA FALL'S, TX PORTION ONLY. WILL COMPLETE THE OTHER PORTION OF THIS UNIT THE WEEK OF AUGUST 16, 04. FOUND SOME ISSUES WITH THE R.O.W. CONDITION THAT WILL PROBABLY RESULT IN A NOPV. INSPECTED THE REST OF THIS UNIT THE WEI OF AUGUST 16 THRU 19/04 WHICH CONSISTED OF CORSICANA, TX TO THE ARKANSAS/TEXAS STATE LINE 20" CRUDE AND THE KILGORE,TX TO CORSICANA,TX 12" CRUDE LINE. THESE TWO LINES ARE IDLE PACKED WITH A NITROGEN BLANKET. THIS INSPECTION CONSISTED OF 4 AFO DAYS.							
Operator Name and Address							
	MOBIL PIPELINE CO						
	800 BELL STREET						
	DO DOX 2220						
	P.O. BOX 2220						
	HOUSTON, TX 77002-7	7002					
		7002					
	HOUSTON, TX 77002-7	7002					

IOCS Inspection Summary Activity ID: 109429

Unit Name and Address

3944 CORSICANA AREA P. O. BOX 618 CORSICANA, TX 75151-5151

Region I SW 0

Insp PlanPipeline TypeONSHORE1 INTERSTATE LIQUIDJurisdiction:A01FEDERAL

Emergency Phone: 214/742-3106 Records: CORSICANA Location: CORSICANA, TX

Pipeline Description:

16" CRUDE FROM WICHITA FALLS TO RINGGOLD TO KELLER TO CORSICANA; 20" CRUDE (#1) CORSICANA TO THE TEXAS/ARKANSAS STATE LINE; 12" CRUDE KILGORE TO CORSICANA (EAST TEXAS). Comments:

Conclusions:

NEXT INSPECTOR SHOULD CHECK FOR ROW CONDITIONS MENTIONED IN THE COMMENTS SECTION. OPERATOR APPEARS T BE MAKING A RESONABLE EFFORT TO COMPLY.

Recommendations:

NO INCREASE IN INSPECTION FREQUENCY RECOMMENDED. SUGGEST LONGER PERIOD BETWEEN INSPECTIONS FOR THE 263 MILES OF 20" AND 12" THAT ARE IDLE.