

Name of Operator: ExxonMobil Pipeline Company

HQ Address: 800 Bell Street Houston, Texas 77002	System/Unit Name Address: AR 800 Bell Street EMB Room 625-A Houston, Texas 77002
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Co. Official (Pres or VP) Drew Turner, VP Operations	Telephone number: (713) 656-3926
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Operator ID:	Unit ID: 1191	Activity ID:
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Unit IDs of adjacent Operator units:

Persons Interviewed	Titles	Phone Numbers
M. H. (Mike) Adams	Pipeline Safety Advisor	(713) 656-3926
T. D. (Denny) Wedgeworth	Corrosion Technician	(903) 986-2056
G. J. Sigle	Maintenance/Operations Technician	(870) 542-6221
D. G. Sterling	Pipeline Safety Advisor	(281) 922-3653

OPS Representative(s): Michael A. Schwarzkopf 11 - 13 December 2001

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

System/Unit Description:

296 mile single line 20" crude oil pipeline. Unit begins at Red River (Texas/Arkansas state line) and goes to Arkansas/Missouri state line. 20" DO x 0.312" wt API 5L X-42, coal tar coated pipe. Four (4) pump stations in Arkansas - Foreman, Glenwwod, Conway, and Strawberry.

Mobil Pipeline becomes ExxonMobil Pipeline in January 2002 as part of earlier merger of the two companies. Employees are ExxonMobil Pipeline employees; the control center is currently in Dallas, Texas but will be moving to Houston, Texas to be part of the ExxonMobil Pipeline control center in the 3rd quarter of 2002. The change in Control center location will change the emergency number from Dallas number to an 800 number in Houston.

O&M manual not checked in detail. O&M inspection was performed on ExxonMobil earlier in year, ExxonMobil is using previous manuals and will use new combined one when published in 2002.

Portion of Unit Inspected:

Records (brought to Foreman Station) , all pump stations, and multiple points on the ROW.

Was a Team O&M inspection completed previously? Yes	If yes, document date? / /
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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.

MOP/Overpressure Protection

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				
Q1) Field	X			
R1) Headquarters				
R1) Field	X			

1) Comments: Checked data in manuals, did not check hydrotest records.

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				
Q2) Field	X			
R2) Headquarters				
R2) Field		X		

2) Comments: Discrepancies:

- 1) Foreman Station - 3 May 2001, discharge pressure on chart shows pressure of approximately 950 psi (890 psi MOP) from 1130 to 1330. Control center is checking, initial investigation shows that there was an alarm at 906 psi, which was acknowledged, and then the pressure fluctuated between 906 and 910 psi for about 1 - ½ hours.
- 2) Conway Station - 18 September 2000, discharge pressure shows 920 psi (890 psi MOP) from approximately 0100 to 0800 when the chart was changed, new chart shows pressure of around 890 psi from 0600 on. ExxonMobil is investigating control center records. SCADA logs show max pressure was 887.5 psi, NO PROBLEM.

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				
Q3) Field	X			
R3) Headquarters				
R3) Field	X			

3) Comments: Checked semi-annually

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				
Q4) Field	X			
R4) Headquarters				
R4) Field	X			

4) Comments:

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				
Q5) Field			X	
R5) Headquarters				
R5) Field			X	

5) Comments:

No abnormal operating conditions since last inspection.

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				
Q6) Field	X			
R6) Headquarters				
R6) Field	X			

6) Comments: Pressure charts are maintained at each pump station and electronic SCADA records are maintained at Dallas control center. The station Maintenance/Operations Technician maintains a station log where any maintenance condition or operating condition is recorded.

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				
Q7) Field	X			
R7) Headquarters				
R7) Field			X	

7) Comments:

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				
Q8) Field			X	
R8) Headquarters				
R8) Field			X	

8) Comments:

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				
Q9) Field	X			
R9) Headquarters				
R9) Field	X			

9) Comments: Pressure gauges.

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				
Q10) Field	X			
R10) Headquarters				
R10) Field	X			

10) Comments: Station buildings are equipped with detectors for hazardous vapours and there are fans that runs 24 hours a day in the buildings.

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				
Q11) Field	X			
R11) Headquarters				
R11) Field	X			

11) Comments: SCADA is used to control the stations, they can be operated in un-manned mode.

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				
Q12) Field	X			
R12) Headquarters				
R12) Field	X			

12) Comments:

G-Q13) Best Practice:

Does the operator have a means to prevent controller fatigue?

13) Comments: Not checked.

EVALUATION OF COMPUTATIONAL PIPELINE MONITORING 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				
Q14) Field				X
R14) Headquarters				
R14) Field				X

14) Comments: not checked, control center function.

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				
Q15) Field				X
R15) Headquarters				
R15) Field				X

15) Comments: not checked, control center function

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				
Q16) Field	X			
R16) Headquarters				
R16) Field	X			

16) Comments:

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				
Q17) Field	X			
R17) Headquarters				
R17) Field	X			

17) Comments:

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				
Q18) Field	X			
R18) Headquarters				
R18) Field	X			

18) Comments:

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				
Q19) Field	X			
R19) Headquarters				
R19) Field	X			

19) Comments: plans reviewed and compared to facilities.

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				
Q20) Field	X			
R20) Headquarters				
R20) Field		X		

20) Comments: Line is patrolled by air on a weekly basis, observations are reported directly to the local Maintenance/Operations Technician. Patrol reports are sent by pilot to Mike Adams who sends copies to local stations and files their copy of the completed report. If the pipeline is exposed for any reason, there is a pipeline exposure report prepared. A list of all exposed pipe segments is maintained, checked annually. Exposed pipe segments are marked with pipeline markers. The construction team has the list of exposed pipe segments and they prioritize them for repairs.

Checked three exposed pipe segments, all were marked but one is a concern.

D/S of MP 258.7 near intersection of Clearcreek and Treasure Isle roads the pipe is exposed in a ditch beside the road, there is no shoulder to the road and possibility exists for a vehicle going off the road and hitting the pipe.

ExxonMobil stated that temporary barricades were in place the evening of the discovery and that Terry Lough would be going to location the next day to make temporary repairs using bags of QuickCrete to protect the pipe until a solution to the problem could be identified and implemented. Repairs made on 14 December 2001.

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				
Q21) Field	X			
R21) Headquarters				
R21) Field	X			

21) Comments: A list of exposed pipe segments is maintained and they are checked annually.

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				
Q22) Field	X			
R22) Headquarters				
R22) Field	X			

22) Comments:

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:

did not discuss during this inspection. Information on maintenance is forwarded to the Pipeline Safety Advisor.

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				
Q24) Field	X			
R24) Headquarters				
R24) Field	X			

24) Comments: Personnel are now trained under a new ExxonMobil CBT system in addition to drills.

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				
Q25) Field	X			
R25) Headquarters				
R25) Field	X			

25) Comments:

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

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

R26) Associated Records?

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

26) Comments:

Not checked, done by separate OPS team

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				
Q27) Field	X			
R27) Headquarters				
R27) Field	X			

27) Comments: Pipeline is protected by an impressed current CP system. Internal corrosion is monitored by coupons in tanks at Patoka, IL. Inhibitors are injected at various station on the pipeline.

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:

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				
Q29) Field	X			
R29) Headquarters				
R29) Field	X			

29) Comments:

195.402, 195.414, 195.416, 195.418

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				

Q30) Field	X			
R30) Headquarters				
R30) Field	X			

30) Comments:

Corrosion technician performs annual surveys (or receives results if contracted out) and is present when any pipe is cut out, also investigates pipe exposures and receives any information that involves or might effect the corrosion protection on the pipeline.

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				
Q31) Field	X			
R31) Headquarters				
R31) Field	X			

31) Comments: Prompt remedial action is taken to discrepancies identified.

Request made to check out Mobil's crossing with the Koch ammonia line. In 2001 there was a 3 mV difference between the readings on the two line while in 2000 there was a 4 mV difference even though the readings in 2001 were approximately 300 mV less negative.

Q32) Best Practice:

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

32) Comments: Pipeline had a ILI tool run in 2001, awaiting analysis on data from it. IMP will be major factor in ILI runs.

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				
Q33) Field			X	
R33) Headquarters				
R33) Field			X	

33) Comments:

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				
Q34) Field			X	
R34) Headquarters				
R34) Field			X	

34) Comments:

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				
Q35) Field			X	
R35) Headquarters				
R35) Field			X	

35) Comments:

G-36) Best Practice:

Are the breakout tanks equipped with high level alarms?

36) Comments: n/a. No Tanks in Arkansas.

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				
Q37) Field	X			
R37) Headquarters				
R37) Field	X			

37) Comments:

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				
Q38) Field	X			
R38) Headquarters				
R38) Field	X			

38) Comments:

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				
Q39) Field	X			
R39) Headquarters				
R39) Field	X			

39) Comments:

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				
Q40) Field	X			
R40) Headquarters				
R40) Field	X			

40) Comments:

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				
Q41) Field	X			
R41) Headquarters				
R41) Field	X			

41) Comments: Valves are fenced.

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				
Q42) Field	X			
R42) Headquarters				
R42) Field	X			

42) Comments:

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: Yes.

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: Yes. Remote controlled valves located at river crossings and pump stations. Checked MOV at White River and it operated correctly upon command from control center.

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				
Q45) Field	X			
R45) Headquarters				
R45) Field	X			

45) Comments: Weekly aerial patrols and annual ground patrol check of exposed pipe.

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				
Q46) Field	X			
R46) Headquarters				
R46) Field	X			

46) Comments: Markers currently have Mobil Pipeline listed as the operator and the (214) number for the Dallas control center. In 2002 the name on the markers will be changed to ExxonMobil and the emergency number changed to the 800 number for the Houston control center.

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				
Q47) Field	X			
R47) Headquarters				
R47) Field	X			

47) Comments: ExxonMobil participates in state One-Call program as well as holding Pipeline Group meetings in state

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				
Q48) Field	X			
R48) Headquarters				
R48) Field	X			

48) Comments: ExxonMobil participates in state One-Call as well as holding Pipeline Group meetings for excavators and public officials, mail-outs are also sent to land owners and excavators.

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

49) Comments: ExxonMobil employees mark the line for locates.

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				
Q50) Field	X			
R50) Headquarters				
R50) Field	X			

50) Comments: ExxonMobil holds Pipeline Group meetings and makes direct contact with government agencies.

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: n/a the pipeline is in remote areas except near Conway.

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

G-Q53) Best Practice:

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

53) Comments: n/a for this pipeline

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: ExxonMobil has reviewed Common Ground and is using portions of it to improve it's Damage Prevention program

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.

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? Did not look at plan, checked emergency procedures. RSPA Tracking Number _____ Approval Date _____ [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		

Reviewed table-top exercise (conducted on 11 December 2001) as well as other drill records.

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.

Repairs to wash out at MP 258.7 on the #1-20" in Garland County Arkansas

On Friday, December 14, 2001 I took a crew and repaired the washout in the barrow ditch at MP 258.7 on the # 1- 20" Crude Line at the intersection of Treasure Isle Rd. and Clear Creek Rd. in Garland County Arkansas.

Steps taken were :

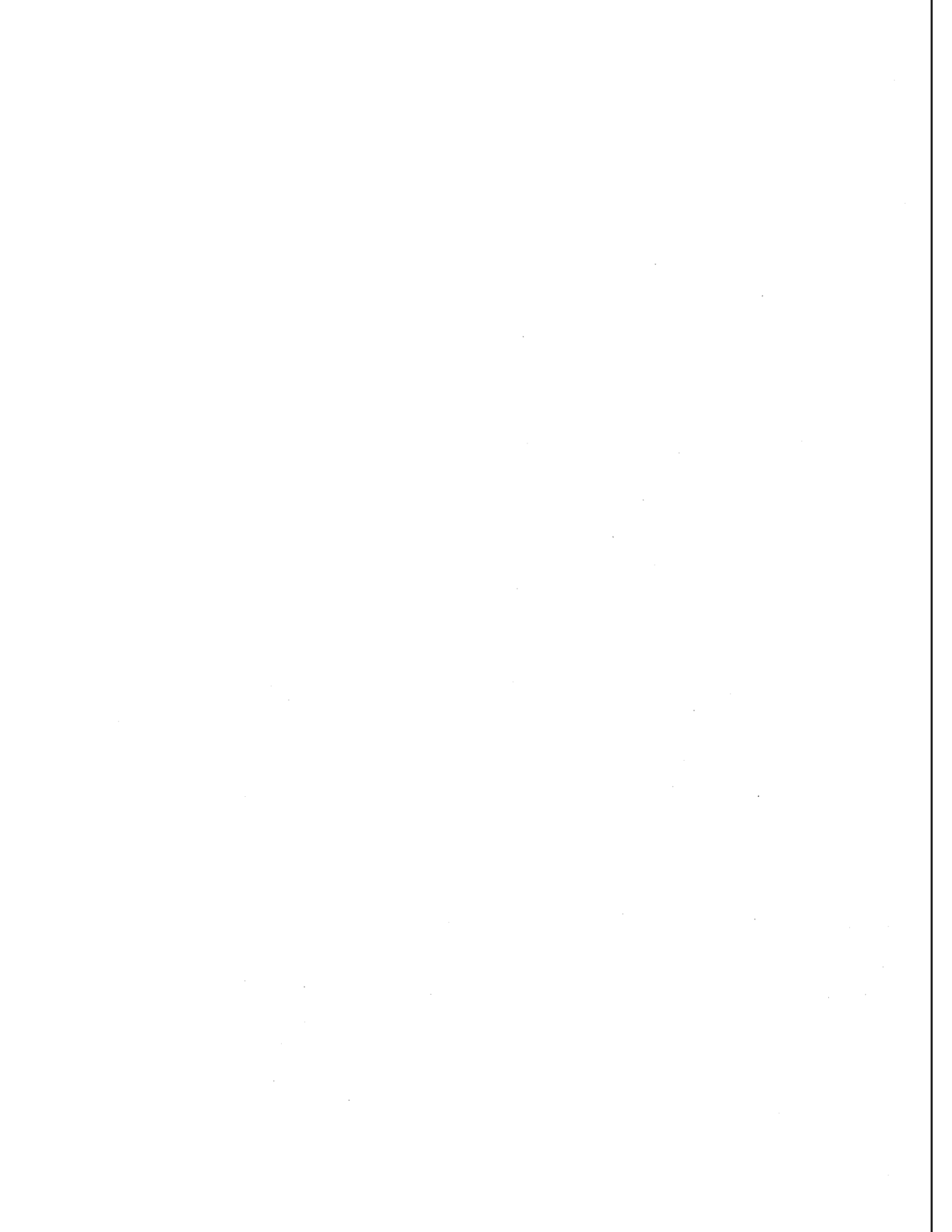
1. Placed dam in barrow ditch and set 3" pump to divert water around work area.
2. Dug out around 20 " line, cleaned and dried pipe, applied Polyguard primer and the put on Polyguard RD 6 Wrap to repair coating on the line.
- 3.Placed sandbags (apx. 75 bags) on and around pipeline, then placed 80lb. Sacks of Quickrete (74 bags) over the sandbags to form a smooth and tapered ditch area.
4. Placed rock "Rip Rap " (3" to 6" dia.) over the bags of Quickrete These rocks were approximately 6" to 8" deep.
5. We then poured mixed Quickcrete over the RipRap to stabilize the rocks.

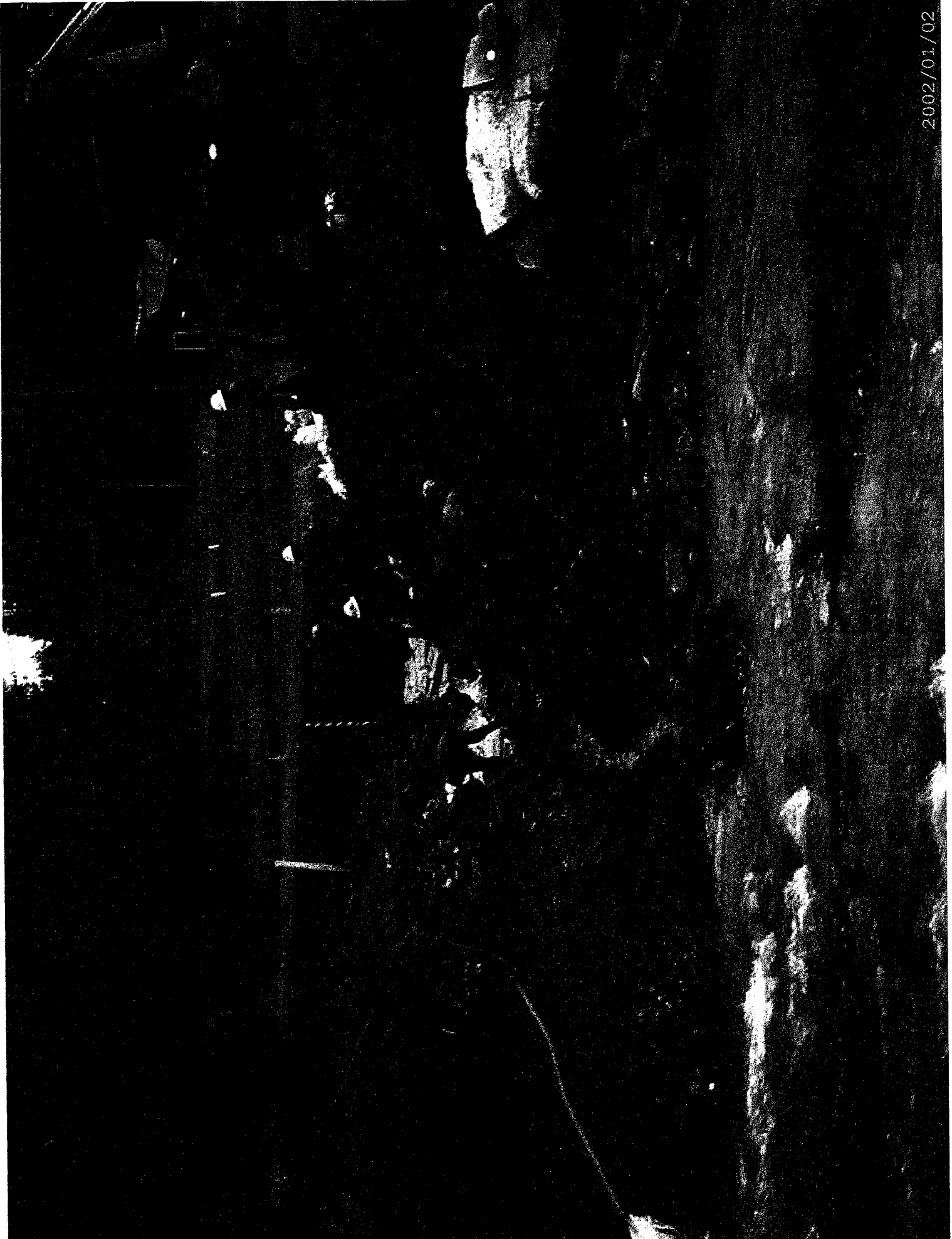
This repair will be monitored and checked monthly until permanent repairs can be made when this area dries up.



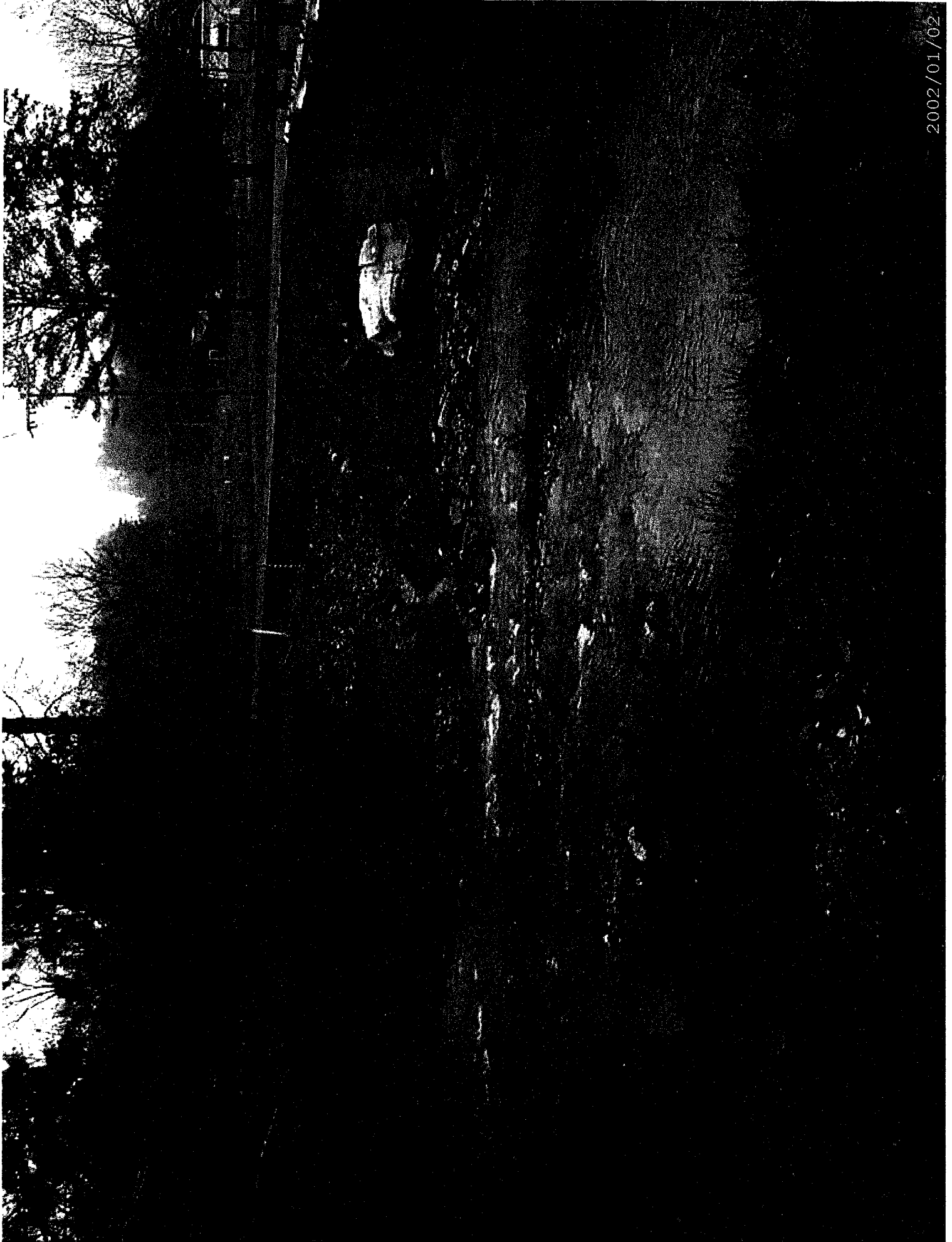
CLEARCREEK RD
TREASURE ISLE RD







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