



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

8701 South Gessner, Suite 1110  
Houston, TX 77074

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

April 9, 2013

Mr. Gary W. Pruessing  
President  
ExxonMobil Pipeline Company  
800 Bell Street  
Room 3180H  
Houston, TX 77002

**Re: CPF 4-2013-5006H Request for Approval Pursuant to CAO Item 3**

Dear Mr. Pruessing:

We have received your letters of April 5 and 8, 2013, regarding the actions proposed by ExxonMobil Pipeline Company (EMPCo) in reference to Items 1 and 3 of the Corrective Action Order. The information related to Item 1, regarding the actions proposed to excavate the line, are considered limited in scope and include the plans and procedures for pipe removal and temporary repairs to the line only. Further discussions and information will be required and discussed as the testing and Integrity Verification Plan are drafted, approved, and implemented.

Specifically to Item 3, EMPCo requests approval to use Hurst Metallurgical Research Lab, Euless, Texas to conduct the required metallurgical testing on the failed section of pipe. We have reviewed the request and proposed protocols and have no objection to EMPCo's request.

Please continue to communicate the plans and scheduling for testing with my office. While it is not our intent to delay the testing, we do intend to attend and witness some of the testing. To that end and as required by the order, please forward the schedule for testing as it is developed. Should you have further questions, please feel free to directly contact Mary McDaniel at (713) 272-2847.

Sincerely,

R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous  
Materials Safety Administration

**ExxonMobil Pipeline Company**

800 Bell Street, Room #603B  
Houston, Texas 77002  
(713) 656-0227 Telephone  
(713) 656-8232 Facsimile

**Mark D. Weesner**

Safety, Health And Environment Department  
Manager

**ExxonMobil  
Pipeline**

April 5, 2013

Mr. Rodrick M. Seeley  
PHMSA Southwest Region, Director  
8701 S. Gessner Road, Suite 1110  
Houston, TX 77074

Re: CPF No. 4-2013-5006H – Acknowledgment and Requests for Approval Pursuant to CAO Item 3.

Dear Mr. Seeley:

Please let this serve as ExxonMobil Pipeline Company's ("EMPCo") acknowledgement that it received PHMSA's Corrective Action Order (CPF 4-2012-5019H) on April 2, 2013. In addition, pursuant to EMPCo's conversations with various PHMSA representatives, attached for PHMSA's review are the procedures for the removal and replacement of the damaged segment of pipe (Attachment I), which includes the Evidence Control Protocol and Procedure for the Validation Digs for the TFI ILI Tool Run. EMPCo is ready to begin executing such protocols upon receipt of PHMSA's approval.

Further, pursuant to Requirement 3. of the CAO, EMPCO submits the following information for your consideration and approval. Requirement 3. is quoted below for reference.

**PHMSA CAO Requirement**

*3. Metallurgical Testing. Within 45 days of receipt of this Order, complete mechanical and metallurgical testing and failure analysis of the failed pipe, including analysis of soil samples and any foreign materials. Complete the testing and analysis as follows:*

- A. Document the chain-of-custody when handling and transporting the failed pipe section and other evidence from the failure site;*
- B. Within 10 days of receipt of this Order, develop and submit to the Director the testing protocol, including selection of the testing laboratory, for prior approval.*
- C. Prior to commencing the mechanical and metallurgical testing, provide the Director with the scheduled date, time, and location of the testing to allow a PHMSA representative to witness the testing; and*
- D. Ensure that the testing laboratory distributes all resulting reports in their entirety (including all media), whether draft or final, to the Director at the same time as they are made available to Respondent.*

**EMPCo Response**

3. EMPCo is progressing PHMSA's requirement for testing and analysis. As discussed with PHMSA's Mary McDaniel, EMPCo proposes that the failed pipe segment be transported to Hurst Metallurgical Research Lab, in Euless, Texas after excavation and removal.
- a. EMPCo will document the chain of custody of the failed pipe segment from Mayflower, Arkansas to Hurst Metallurgical Research Lab in Euless, Texas as described in the Evidence Control Protocol.
  - b. EMPCo submits the attached Mechanical and Metallurgical Testing and Failure Analysis protocol for PHMSA's approval (Attachment II). The protocol was developed consistent with PHMSA's testing protocol. EMPCo proposes Hurst Metallurgical Research Lab, located at 2111 West Euless Blvd Euless, Texas 76040, as the testing laboratory and requests your approval prior to testing and analysis. Hurst has provided metallurgical services since 1973 and has been accredited to the ISO/IEC 17025:2005 standard by the American Association for Laboratory Accreditation (i.e., "A2LA"). In addition, Hurst has a historical/working knowledge of the Affected Pipeline, as they assisted with metallurgical analyses associated with the 2005/2006 hydrotest on the pipeline. As such, Hurst offers efficiencies that other laboratories cannot offer in that they already understand the pipeline, the history, and the potential failure mechanisms related to the pipeline. Our contact with Hurst is Mahesh Madhani, who can be reached at 817.283.4981.

EMPCo hereby requests PHMSA's approval to use Hurst Metallurgical Research Lab and on the attached Mechanical and Metallurgical Testing and Failure Analysis Protocol.

- c. Prior to any testing being conducted, EMPCo will notify PHMSA of the time and location of the testing.
- d. EMPCo will instruct the approved testing laboratory to include PHMSA on any reports in their entirety (final and drafts) at the same time they are submitted to EMPCo.

Please let us know as soon as possible whether you approve of the following:

- The procedures for the removal and replacement of the damaged segment of pipe;
- The selection of Hurst Metallurgical Research Lab as the testing laboratory; and
- The proposed Mechanical and Metallurgical Testing and Failure Analysis Protocol.

EMPCo reserves all rights provided under the relevant laws and regulations, including its right to request a hearing regarding the CAO pursuant to 49 U.S.C. § 60112 and 49 C.F.R. § 190.233, and nothing herein is intended to waive those rights.

Sincerely,



*Chris Hinson, for Mark Weisner*

Attachments:

- Attachment I – Procedures for Removal and Replacement of the Damaged Segment of Pipe
- Attachment II – Mechanical and Metallurgical Testing and Failure Analysis Protocol

**ExxonMobil Pipeline Company**

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(713) 656-8232 Facsimile

**Mark D. Weesner**

Safety, Health And Environment Department  
Manager

**ExxonMobil**  
*Pipeline*

April 8, 2013

Mr. Rodrick M. Seeley  
PHMSA Southwest Region, Director  
8701 S. Gessner Road, Suite 1110  
Houston, TX 77074

Re: CPF No. 4-2013-5006H –Submission of Pipe Removal and Replacement Procedures

Dear Mr. Seeley:

Please let this serve as a supplement to ExxonMobil Pipeline Company's ("EMPCo") letter of April 5, 2013. By that letter EMPCo submitted for PHMSA's review: comprehensive procedures for the removal and replacement of the damaged segment of pipe (which included procedures related to ILI confirmation digs); a proposal to use Hurst Metallurgical Research Lab for the metallurgical testing pursuant to CAO Requirement 3; and the Mechanical and Metallurgical Testing and Failure Analysis Protocol pursuant to CAO Requirement 3. Upon receipt, PHMSA's Mary McDaniel and Gene Roberson requested that EMPCo resubmit for PHMSA's review only the procedures specifically related to the removal and replacement of the damaged pipe (generally pursuant to CAO Item 1. Return to Service). Attached to this letter are the procedures responsive to that request (with proposed revisions as requested by PHMSA's Gene Roberson).

Please let us know as soon as practical whether PHMA has any objection to the attached procedures.

Sincerely,



*Christopher Hinson, on behalf of Mark Weesner*

Attachments: Procedures for Removal and Replacement of the Damaged Segment of Pipe