

ExxonMobil Pipeline Company

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Mark D. Weesner

Safety, Health And Environment Department
 Manager



January 31, 2014

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

Re: CPF No. 4-2013-5006H – Restart of Southern Segment of Pegasus Pipeline

Dear Mr. Seeley:

Pursuant to items of the Corrective Action Order ("CAO"), ExxonMobil Pipeline Company (EMPCo) hereby submits additional information and requests approval to restart the Southern Segment of the Pegasus Pipeline (Corsicana, TX to Nederland, TX) at a reduced pressure.

The pipeline segment is approximately 210 miles long and contains the following segments:

Mileage	OD (in)	wt (in)	Grade	Seam Type	Install Date
172.2	20	0.312	X-46	EFW	1951
28.5	20	0.375	X-46	EFW	1954
5.8	16	0.250	X-52	ERW	1973
2.0	20	0.500	X-42	ERW	1986-1987
0.9	20	0.500	X-46	ERW	1986
0.6	20	0.500	B	SMLS	1986
0.4	20	0.500	X-46	DSAW	1991
0.1	20	0.344	X-52	ERW	1980
0.1	20	0.375	X-52	ERW	1999
0.1	20	0.344	X-42	ERW	1969
0.1	16	0.375	X-52	ERW	1973
0.05	20	0.375	X-52	SMLS	1987
0.02	20	0.375	X-42	ERW	1991
0.02	20	0.375	X-52	ERW	2000
0.01	20	0.375	X-42	ERW	1991-2005
0.01	20	0.375	X-46	ERW	1986
0.01	20	0.344	X-42	SMLS	1985

The Southern Segment of Pegasus Pipeline was hydrostatically tested in 1991 to 90-95% SMYS. Consistent with requirements outlined in the CAO, the maximum operating pressure of the sub-segments will be as follows:

- Corsicana Station to Grapeland Station - (b) psig
- Grapeland Station to Groveton Station (b) psig
- Groveton Station to Bragg Station - (b) psig

(7)

- Bragg to Nederland - (b) psig.

As required by the CAO (as amended by the May 10, 2013 Post-Hearing Decision letter), these MOPs represent 80% of the upstream pump station's actual operating pressure in effect immediately prior to failure (except for Grapeland Station to Groveton Station, which will be limited to 80% of the maximum discharge pressure 4 days prior to the failure, as it was not in operation when the failure occurred).

For reference, PHMSA's CAO (as amended for Item 7.) provided the following Corrective Actions:

1. Obtain written approval from the Director prior to resuming operation.
2. Develop and submit a written re-start plan for prior approval of the Director, Southwest Region. The restart plan must provide for adequate patrolling of the Affected Pipeline during the restart process and include measures to confirm the integrity of the pipeline facilities that were damaged or are suspected of being damaged as a result of the Failure. The restart plan must specify a daylight restart and provide for advance communications with local emergency response officials.
7. After receiving approval from the Director to restart the Affected Pipeline, operating pressure may not exceed 80% of the actual operating pressure in effect immediately prior to the failure. Pressure at the failure site may not exceed 566 psig. For each pump station on the Affected Pipeline, submit the operating pressure at the time of failure and the reduced discharge pressure limit in the restart plan referenced in Item 2. If a station was not operating at the moment of failure, the reduced discharge pressure limit may be calculated from its most recent operating pressure prior to the failure. The pressure restriction required by this Order requires that any relevant remote or local alarm limits, software programming set-points or control points, and mechanical over-pressure devices be adjusted accordingly. The pressure restriction will remain in effect until written approval to increase the pressure or return the pipeline, or a portion thereof, to its pre-failure operating pressure is obtained from the Director pursuant to Item 8.

EMPCo Response

Please see the attached Restart Plan (Attachment A), submitted for PHMSA's review. EMPCo intends to initiate restart activities no later than March 28, 2014. Engineering evaluations to determine specific facility modifications to accommodate the reduced pressure requirements (and associated timing) are still in progress. EMPCo has no reason to suspect that any pipe in this segment was damaged by the failure in Mayflower, AR; nevertheless, EMPCo plans to perform a stand up test prior to flow to verify integrity, regardless of whether the start-up occurs prior to the anticipated date.

EMPCo is requesting that PHMSA review the attached Plan and approve the restart of the Southern Segment of the Pegasus Pipeline system at the reduced pressures. Please contact me or Thad Massengale (713-656-2258) if you have any questions or comments.

Sincerely,



Mark D. Weesner

Attachment:

- Restart Plan (Attachment A)

SOUTH PEGASUS SYSTEM (CORSICANA TO NEDERLAND) RESTART PLAN

SECTION 1 – PHMSA NOTIFICATION

DESCRIPTION OF WORK	
Title: Southern Section of the Pegasus System Restart Plan	
General Description of Work: The Southern Section of the Pegasus System Pipeline will be restarted at no more than 80% of the actual discharge pressure of each pump station in effect immediately prior to failure except for the Groveton Pump Station, which will use 80% of the maximum pressure 4 days prior to the failure as specified in the amended CAO dated 5/10/13	
Start Date: 02/15/14	End Date: 03/28/14

GENERAL INFORMATION		
System:	Corsicana To Nederland 20"(CN-35)	Product: Crude Oil
Locations:		
Pump Stations: Corsicana, Grapeland, Groveton, Bragg		
Surveillance/Valve Sites: Fairfield, Trinity, Bevil Oaks, Beaumont Terminal		

CONTACTS			
Name	Company	Office	Cellular
Christopher Hinson	EMPCo/SHE	713-656-9750	(b) (6)
Thad Massengale	EMPCo/SHE	713-656-2258	

SPECIAL CONSIDERATIONS / COMMENTS	
1. Adequate patrolling of the pipeline will be provided – Includes monitoring by air patrol and by ground personnel during the restart. In case of inclement weather that would prevent air or ground patrolling, the restart would be delayed until adequate weather conditions are present.	
2. The restart will occur during daylight hours. (½ hour before sunrise to ½ hour after sunset)	
3. Advanced communication to local emergency officials before the restart will be provided.	
4. Relevant remote or local alarms, software programming set-points or control points, and mechanical over-pressure devices will be adjusted accordingly to limit the operating pressure to no more than 80% of the actual operating pressure in effect immediately prior to failure at all pump stations except for Groveton, which will be limited to 80% of the maximum discharge pressure 4 days prior to the failure since it was not in operation when the failure occurred.	
Submitted by: Mark Weesner	Date: 01/31/2014

SOUTH PEGASUS SYSTEM (CORSIANA TO NEDERLAND) RESTART PLAN

SECTION 2 – RESTART PLAN

2.0 Scope

- 2.1 Increased monitoring will occur during the restart.
- Air patrols will occur twice a day during the restart and once a day after restart for a week.
 - Operations technicians will be located at key sites (automated main line block valves and pump stations) during the restart.
 - The OCC controller will closely monitor the pressures and flow rate during the restart.
- 2.2 While no segments of the Southern Section of the Pegasus System pipeline were damaged or suspected of being damaged as a result of the Failure, measures to confirm the integrity of the Southern Section pipeline will include:
- A stand-up test (to be conducted during daylight hours) will be performed on each sub-segment at 80% of the upstream pump station's actual operating pressure in effect immediately prior to failure except for Groveton, which will be limited to 80% of the maximum discharge pressure 4 days prior to the failure since it was not in operation when the failure occurred. Those pressures are as follows:
 - Corsicana to Grapeland – (b) psig
 - Grapeland to Groveton – (b) psig
 - Groveton to Bragg – (b) psig
 - Bragg to Nederland - (b) psig
- 2.3 The restart will occur during daylight hours. (½ hour before sunrise to ½ hour after sunset)
- 2.4 Notifications will be made to local emergency officials (LEPC) before the restart
- **Texas-Corsicana Area:**
 - Bowie LEPC
 - Red River LEPC
 - Titus LEPC
 - Franklin LEPC
 - Hopkins LEPC
 - Rains LEPC
 - Van Zandt LEPC
 - Kaufman LEPC
 - Henderson LEPC
 - Navarro LEPC
 - Freestone LEPC
 - Leon LEPC
 - Anderson LEPC
 - Houston LEPC
 - Trinity LEPC
 - **Texas-Nederland Area:**
 - Polk County LEPC
 - Hardin County LEPC
 - Jefferson County LEPC

SOUTH PEGASUS SYSTEM (CORSICANA TO NEDERLAND) RESTART PLAN

- 2.5 All local and SCADA (remote) system safety devices for the South Pegasus System will be set to no more than 80% of a sub-segment's upstream pump station's discharge pressure in effect immediately prior to the failure.
- Groveton will be limited to 80% of the maximum discharge pressure 4 days prior to the failure because it was not operating when the incident occurred.
 - All local control & safety devices will be reset locally and in the SCADA system to the values in Table 1.

Table 1

<i>Station discharge press. at 14:37 on March 29, 2013 (OCC SCADA)</i>		Derate Information		Revised Set Points (psig)					
Pump Station or Surveillance Site	Dish. Press. (psig)	80% X Dish. Press. (psig)	Derate Press. (psig)	PSH	Lock-out	Op Trip	HH	H	Control Range
Corsicana	(b) (7)(F)								
Fairfield Surv.									
Trinity Surv.									
Grapeland									
Groveton									
Bragg									
Bevil Oaks Surv.									
Beaumont Terminal									
Nederland									

- The Local & Operations Control Center (OCC) Operating Instructions will be revised as necessary to reflect these changes.
- 2.6 A documented review of the OCC OI's changes will be conducted with all affected Controllers and Controller Supervisors.
- Controllers will be trained on the new operating parameters and be given the opportunity to provide feedback.
 - A dedicated Controller will be utilized during the initial start-up operation. A documented hand off to the Console Controller will occur after the all phases of the startup are complete and the line is operating at stable conditions.
- 2.7 A documented review of the Local OI's will be conducted with affected Field Operations personnel

SOUTH PEGASUS SYSTEM (CORSIANA TO NEDERLAND) RESTART PLAN

SECTION 3 - CAO REQUIRED CORRECTIVE ACTIONS FOR RESTART

(Note: Includes Action Number)

- 3.1 #2 - Adequate patrolling of the affected pipeline during the restart
 - Addressed within Restart Plan – Section 2.1

- 3.2 #2 – Measures to confirm the integrity of the pipeline facilities that were damaged or are suspected of being damaged as a result of the failure
 - Addressed within Restart Plan – Section 2.2

- 3.3 #2 - Daylight Restart
 - Addressed within Restart Plan – Section 2.3

- 3.4 #2 - Advance Communications with Local Emergency Response Officials
 - Addressed within Restart Plan – Section 2.4

- 3.5 #7 – Operating pressure may not exceed 80% of the actual operating pressure in effect immediately prior to the failure. For each pump station on the Affected Pipeline, submit the operating pressure at the time of failure and the reduced discharge pressure limit in the restart plan referenced in Item 2. If a station was not operating at the moment of failure, the reduced discharge pressure limit may be calculated from its most recent operating pressure prior to the failure.
 - Addressed within Restart Plan – Section 2.5

- 3.6 #7 - The pressure restriction required by this Order requires that any relevant remote or local alarm limits, software programming set-points or control points, and mechanical over-pressure devices be adjusted accordingly.
 - Addressed within Restart Plan – Section 2.5
 - Refer to Table 1 on page 3