

**ExxonMobil Pipeline Company**

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**Mark D. Weesner**

Safety, Health And Environment Department  
Manager



June 6, 2013

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

Re: CPF No. 4-2013-5006H –Corrective Action Order Item #3 Metallurgical Testing

Dear Mr. Seeley:

Pursuant to Corrective Action Order ("CAO") Item #12 (*Extensions of Time*), ExxonMobil Pipeline Company (EMPCo) hereby requests an additional four week time extension for completion of CAO Item #3 (Metallurgical Testing). CAO Item #3 Metallurgical Testing, provides:

*3. Metallurgical Testing. Within 45 days of receipt of this Order, complete mechanical and metallurgical testing and failure analysis of the failed pipe. 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.*

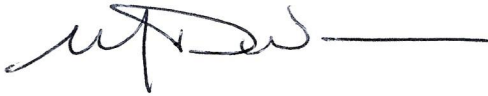
*C. Prior to commencing the mechanical and metallurgical testing, provide the Director with the scheduled date, time, and location of the testing to allow a PHMSA representative to witness the testing; and*

*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 received the CAO on April 2, 2013, which would have required that the mechanical and metallurgical testing and failure analysis of the failed pipe, including a written report, be completed by May 17, 2013. On May 9, due to unforeseen testing delays, EMPCo requested an extension to June 7 to allow Hurst Metallurgical Research Laboratory ("Hurst") to finalize testing pursuant to the protocol and produce a written failure analysis report. PHMSA granted the request by letter on May 15. Hurst completed mechanical and metallurgical testing pursuant to the protocol and, on May 25, produced a draft report to both EMPCo and PHMSA. Upon review of the draft report, EMPCo believes additional mechanical and metallurgical testing is warranted to better understand the pipe properties and potential failure mechanisms. EMPCo hereby requests an additional four weeks, to July 10, 2013, to allow Hurst to complete the proposed additional testing and supplement/finalize the draft report.

Please let us know as soon as practicable whether PHMSA objects to this request for additional time to complete CAO Item #3. Assuming no objection from PHMSA, EMPCo will prepare and produce a proposed protocol for the additional testing for PHMSA's review and approval.

Sincerely,

A handwritten signature in black ink, consisting of a stylized, cursive name followed by a horizontal line.