



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

DEC 5 2017

1200 New Jersey Avenue, SE
Washington, D.C. 20590

The Honorable Twinkle Andress Cavanaugh
President
Alabama Public Service Commission
P. O. Box 304260
Montgomery, Alabama 36130-4260

PHMSA-2017-0138

Dear Ms. Cavanaugh:

On October 5, 2017, the Pipeline and Hazardous Material Safety Administration (PHMSA) received notice from the Alabama Public Service Commission (Commission) that the Commission granted a conditional special permit (waiver) to ExxonMobil US Production Company (ExxonMobil). The waiver allows for the use of 4-inch Polyflow Reinforced Thermoplastic Pipe (Polyflow RTP) to transport natural gas between platforms 77B and 95E in Alabama. The distance between the platforms is 7,715 feet (1.46 miles). The waiver was requested since Polyflow RTP is not authorized for use as detailed in 49 CFR 192.59 (Materials-Plastic Pipe) and 49 CFR 192.123 (Design limitations for plastic pipe).

ExxonMobil submitted an application to the Commission to operate the Polyflow RTP composite pipeline by means of a “pull-back” of the pipe through existing carbon steel 6-inch pipelines that were abandoned. The Polyflow RTP is designed to allow for a maximum allowable operating pressure of 1,500 psi if needed. Following installation, the Polyflow RTP line will be operated between 1,150 and 1,200 psi.

The Commission’s grant of the waiver is conditioned on ExxonMobil’s compliance with 17 specific requirements listed in your notice. However, as described below, PHMSA recommends modifications to the language in Condition 9.

Condition 9 currently reads:

“An excess pull of at least 50 feet will be utilized to check for any damage/deformities to the pipe. If any damage/deformities are noted, additional pull-back will be required until damage/deformities are no longer observed.”

PHMSA proposes this condition be revised to read:

(New) Condition 9:

“An excess pull of at least 50 feet will be utilized to check for any damage or deformities to the pipe; if any damage or deformities are noted, additional pull-back will be required until damage or deformities **have not been observed for 50 feet of pull-through.**”

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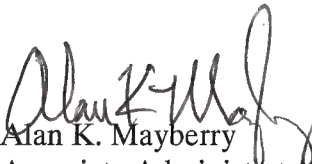
The Honorable Twinkle Andress Cavanaugh
President, Alabama Public Service Commission

If the Commission includes the (New) Condition 9 to the ExxonMobil waiver, PHMSA approves the waiver for release to ExxonMobil, and requests a final copy of the modified waiver issued to ExxonMobil.

If the Commission does not accept PHMSA's modification to Condition 9, PHMSA then the waiver request is denied.

My staff would be pleased to discuss this or any other regulatory matter with you. John Gale, Director, Office of Standards and Rulemaking, may be contacted at 202-366-0434 regarding regulatory matters. Kenneth Lee, Director of Engineering and Research, may be contacted at 202-366-0434 regarding technical matters specific to this waiver.

Sincerely,



Alan K. Mayberry
Associate Administrator for Pipeline Safety