

ExxonMobil Pipeline Company

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Manager



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Pipeline and Hazardous Material Safety Administration
Att: Max Kieba

Leak Detection Draft Report Comments- DTPH56-11-D000001

ExxonMobil Pipeline Company (EMPCo) submits these comments which are limited to the write-up of the Case Study of EMPCo's Silvertip incident included in the report as Section 3.7.4, Case 6 and the associated data found at Page 3-104 of Task 3 Appendix A. EMPCo have also submitted the comments on the website.

- It appears the Report's authors utilized a preliminary version of EMPCo's PHMSA Form 7001 for this incident and not the Supplemental Final report submitted on September 6, 2012. The report should be updated to reflect the information submitted in the Supplemental Final report.
- As the Supplemental Final report states, the line was shut down at 22:48 Mountain Time on July 1, 2011. The Form 7001 data available online on PHMSA's website does not include the narrative portion EMPCo's Form 7001 submission which includes the statement "4. In reference to A4 and A18a - EMPCo Controller noticed equipment changes and pressure loss at 22:40, positive confirmation of the accident occurred at 23:45 when EMPCo received notice from Laurel emergency responders." This is the explanation for what would otherwise appear to be a discrepancy in the time of incident detection (23:45) being after the time of shutdown (22:48).
- The report states "The downstream valve was a check valve. This closed 2 hours and 56 minutes after the control recognized a failure had occurred." Since a check valve is a self-acting valve not needing controller action, the reference to it being closed after the controller recognized a failure is incorrect. While the following information was not requested by the Form 7001, EMPCo can confirm that the check valve was operating correctly and held pressure when subsequently tested. The valve closed when the line lost pressure during the incident.
- The report states that the inventory for the isolated 1,709' section is 166,132 gallons. The report should be corrected to state that the inventory for the section in question is 10,214 gallons.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gary Hartmann", written over a horizontal line.

An ExxonMobil Subsidiary