

Pipeline and Hazardous Materials Safety Administration

CERTIFIED MAIL -RETURN -RECEIPT REQUESTED

March 31, 2014

Mr. Gary Pruessing President ExxonMobil Pipeline Company 800 Bell St., Room 741-D Houston, TX 77002

Re: CPF No. 4-2013-5006H, Approval of Restart Plan, Southern Segment of the Pegasus Pipeline

Dear Mr. Pruessing:

We have received your letter of January 31, 2014, pursuant to Item 2 of the referenced Corrective Action Order (CAO), requesting to restart the "Southern Segment" of the Pegasus Pipeline at a reduced pressure of 80% of the operating pressure at the time of the failure. The ExxonMobil Pipeline Company's (EMPCo) "Southern Segment" is defined as the portion of the CAO Affected Pipeline between Corsicana and Nederland, Texas.

The request outlines the characteristics of the 210 mile long Southern Segment which included among other information, the test pressure range expressed as the percent of the Specified Minimum Yield Strength (SMYS) for the 1991 hydrotest. PHMSA's review of the EMPCo 1991 hydrotest records confirmed that the actual test pressure ranges were between 82-97% SMYS.

The PHMSA review of the information submitted by EMPCo allowed the determination to be made that the restart of the Southern Segment at the proposed maximum pressures in the Restart Plan would limit operations to no more than 50% of the lowest 1991 hydrostatic test pressure at any point on the line, which is 30% lower than allowed by 49 CFR 195, and in all cases, 20% lower than the operating pressure at the time of failure. This margin of safety should allow for the safe operation of the pipeline until the RWP can be approved and implemented.

It is understood by PHMSA that the restart of the Southern Segment will also allow EMPCo to carry out in-line inspection by TFI and UTCD tools in the summer of 2014, which EMPCo integrity management personnel have communicated to PHMSA to be planned activities that will be included in the Remedial Work Plan (RWP) required by CAO Item 4.

PHMSA's review of the information provided by EMPCo has identified areas that will need to be addressed as part of the RWP required by CAO Item 4, and for which EMPCo intends to address as part of its yet to be submitted RWP. The submittal deadline for the RWP is currently set as no later than April 7, 2014.

The CAO allows for time extensions under Item 12. PHMSA has granted two time extensions for the metallurgical testing which by default has extended the timing of the submittal of the RWP which Item 4 of the CAO states shall be submitted within 90 days of completion of the metallurgical testing. With the restart of the Southern Segment, no additional time extensions will be considered for the "Southern Segment" RWP, and it shall be submitted no later than April 7, 2014.

Approval for your request to restart the Southern Segment in accordance with the EMPCo Attachment A, *Restart Plan*, dated January 31, 2014, at the reduced operating pressures stated therein is hereby granted. PHMSA requests no less than 24-hour advance notice of start of operations be provided to this office by e-mail or telephone.

Sincerely,

R. M. Seeley

Director, Southwest Region

Pipeline and Hazardous

Materials Safety Administration

cc:

Mr. Thad Massengale, ExxonMobil Pipeline Company (via email to thad.massengale@exxonmobil.com)

Mr. James Stevens, Senior Counsel, ExxonMobil Pipeline Company (via email to james.r.stevens@exxonmobil.com)