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RAILROAD COMMISSION OF TEXAS

OIL AND GAS DIVISION

April 9, 2009

EXXON MOBIL CORPORATION (257128)
P O BOX 4358
HOUSTON TX 77210-4358

Re: INITIAL REPORT
Elizabeth Burns Complaint No. 04-1239
Kelsey Unit
Brooks County, Texas
Job # 2009-04-3377

On March 23, 2009, Ms. Elizabeth Burns, landowner, contacted the Railroad Commission of Texas (RRC) in Austin by email with concerns of PCB transformers disposal. Ms. Burns inquired if transformers containing PCB were allowed by the RRC to be dumped by ExxonMobil because they used the electricity incidental to their Kelsey Unit. Ms. Burns informed the RRC District Office that ExxonMobil could locate the transformers on her property from their inventory. On March 25, 2009, Glenn Monette, RRC District Office technical staff, conducted a joint inspection with Ricky Garcia and Ben Trujillo of ExxonMobil. The transformer photographed by Ms. Burns and attached in her email to the RRC that was labeled "containing PCBs" was located by ExxonMobil personnel at their Kelsey Unit pipe yard. Two transformers were temporarily being stored until proper disposal could be arranged. Both transformers contained fluid and one transformer was labeled as containing PCBs. The transformers were intact, tightly sealed and showed no signs of leakage. No violations of RRC Statewide Rules were noted.

On April 8, 2009, the RRC District Office received correspondence from ExxonMobil concerning disposal of transformers from the McGill Brothers lease, the Burns' property. This plan characterized the transformers as non-PCB transformers because results of sampling conducted on March 31, 2009, were below PCB contamination thresholds in 40 CFR 761. The PCB testing results and proposed disposal plan were forwarded to Environmental Services in Austin for review.

A file review will be conducted on or after May 8, 2009, and an update will be forwarded to the Field Operations in Austin by May 22, 2009. Please direct all questions regarding this complaint to Glenn Monette at 361-242-3113.

Yours very truly,

A handwritten signature in black ink that reads "Glenn Monette PE".

Glenn Monette, P.E.
Engineering Specialist

Assistant District Director A handwritten signature in black ink, appearing to be "A.D." or similar initials.

cc: Field Operations Section – Austin
Environmental Services - Austin
Ms. Elizabeth Burns, P.O. Box 100, Santa Elena, TX 78591