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Patrick T. Mulva Vice President and Controller

## ExxonMobil

February 26, 2007

Ms. Jill S. Davis Branch Chief U. S. Securities and Exchange Commission Division of Corporation Finance 100 F Street, N.W., Stop 7010 Washington, D.C. 20549

Re: Exxon Mobil Corporation

Form 10-K for the Fiscal Year ended December 31, 2005

Filed February 28, 2006

Form 10-Q for Fiscal Quarters ended March 31, 2006, June 30, 2006, and

September 30, 2006

Filed May 4, 2006 and August 4, 2006 and November 8, 2006

Response Letter Dated February 2, 2007

File No. 1-02256

Dear Ms. Davis:

On behalf of Exxon Mobil Corporation, please find enclosed our response to your comment regarding the above filings set forth in your letter of February 9, 2007.

If you desire clarification of our responses, please direct any questions to Mr. David Levy at 972-444-1290.

Very truly yours,

By: /s/ Patrick T. Mulva

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Name: Patrick T. Mulva

Title: Vice President and Controller

## Attachment

c: Ronald Winfrey Mark Wojciechowski

## ExxonMobil's Response to the Comments Included in the SEC Letter of February 9, 2007

## Form 10-K for the Fiscal Year Ended December 31, 2005

Supplemental Information on Oil and Gas Exploration and Production Activities (unaudited), page 76

1. As requested in the Closing Comments section of our letter dated January 12, 2007, please provide us draft disclosures you anticipate including in your Form 10-K for the fiscal year ended December 31, 2006, to address previous comments one and three.

Attachment 1 provides the format that will be used in the supplemental information on oil and gas activities section in the Form 10-K to present the crude oil and natural gas liquids proved reserves year-end balances and the changes in the net quantities. The same format will be used for natural gas proved reserves. This format is consistent with illustration 4 in FAS 69.

We will expand our disclosure in the Management Discussion and Analysis, "Critical Accounting Policies - Oil and Gas Reserves" in the Form 10-K for the year ended December 31, 2006, as follows:

Beginning in 2004, the year-end reserves volumes as well as the reserves change categories shown in the proved reserves tables are calculated using December 31 prices and costs. These reserves quantities are also used in calculating unit-of-production depreciation rates and in calculating the standardized measure of discounted net cash flow. Regulations preclude the Corporation from showing in this document the reserves that are calculated in a manner that is consistent with the basis that the Corporation uses to make its investment decisions. The use of year-end prices for reserves estimation introduces short-term price volatility into the process since annual adjustments are required based on prices occurring on a single day. The Corporation believes that this approach is inconsistent with the long-term nature of the upstream business where production from individual pro jects often spans multiple decades. The use of prices from a single date is not relevant to the investment decisions made by the Corporation and annual variations in reserves based on such year-end prices are not of consequence to how the business is actually managed.

Revisions can include upward or downward changes in previously estimated volumes of proved reserves for existing fields due to the evaluation or re-evaluation of (1) already available geologic, reservoir or production data, (2) new geologic, reservoir or production data or (3) changes in year-end prices and costs that are used in the determination of reserves. This category can also include changes associated with the performance of improved recovery projects and significant changes in either development strategy or production equipment/facility capacity.

Asia

**Crude Oil and Natural Gas Liquids** Pacific/ United Middle Russia/ States Canada (1) Europe East Caspian Other Africa Total Net proved developed and undeveloped reserves (millions of barrels) of consolidated subsidiaries January 1, 2004 2,792 1,194 615 850 1,184 2,742 512 9,889 Revisions 54 (460)37 (243)(120)(14)(751)(5)Purchases 10 10 Sales (113)(3)(16)(132)Improved recovery 5 5 144 2 Extensions and discoveries 4 3 169 16 (108)(210)(209)(6) (20)(161)(81)(795)Production December 31, 2004 2.593 1,014 2.444 724 478 8.395 627 515 Revisions (256)338 17 78 (27)140 (8) (2)**Purchases** 93 93 (96)(42)(1) Sales (11)(70)(7) (227)Improved recovery 2 3 5 Extensions and discoveries 6 16 47 120 189 (136)(197)(244)(67)(18)(782)Production (107)(13)2,113 832 883 2,312 7,813 December 31, 2005 515 707 451 Revisions **Purchases** Sales Improved recovery Extensions and discoveries Production December 31, 2006 Proportional interest in proved reserves of equity companies End of year 2004 402 17 1,169 911 2,499 End of year 2005 413 11 1,381 873 2,678 End of year 2006 Proved developed reserves, included above, as of December 31, 2004 Consolidated subsidiaries 2,204 763 403 34 561 1,117 129 5,211 Equity companies 347 15 642 600 1,604 December 31, 2005 Consolidated subsidiaries 1,680 607 656 464 55 227 4,907 1,218 326 725 574 Equity companies 9 1,634 December 31, 2006 Consolidated subsidiaries

Equity companies

<sup>(1)</sup> Includes total proved reserves attributable to Imperial Oil Limited of 347 million barrels in 2004, 634 million barrels in 2005 and xxx million barrels in 2006, as well as proved developed reserves of 343 million barrels in 2004, 449 million barrels in 2005 and xxx million barrels in 2006, in which there is a 30.4 percent minority interest.