



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

233 Peachtree Street Ste. 600
Atlanta, GA 30303

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 25, 2007

Mr. John Mollenkopf
Senior Vice President and Chief Operations Officer
MarkWest Hydrocarbon, Inc.
1515 Arapahoe Street
Tower 2, Suite 700
Denver, CO 80202

CPF 2-2007-5001W

Dear Mr. Mollenkopf:

Between December 5 and December 9, 2005, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your pipeline facilities in Kentucky and West Virginia, and reviewed your operation and maintenance records in Kenova, West Virginia.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation(s) are:

1. §195.404 Maps and records.

... (b) Each operator shall maintain for at least 3 years daily operating records that indicate-

- (1) The discharge pressure at each pump station; and**
- (2) Any emergency or abnormal operation to which the procedures under §195.402 apply.**

The Maytown pump discharge pressure records have been incorrect on several recent occasions. The pressure chart recorder was 83 psig "off" in August, 2004, 120 psig low

immediately following the November 8, 2004 Ivel accident, and 25 psig low during this standard inspection.

2. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.

MarkWest Hydrocarbon, Inc (MarkWest) did not follow abandonment procedures in decommissioning a pipeline segment on the 5" pipeline traversing from Flow Station 21 to Handvalve 2B (approximately 1 mile) in February, 2005. The segment was not filled with water or inert material as required of abandonment procedures in *Operations, Maintenance, and Emergencies Manual* (OM&E) section 7.5.

3. **§195.567 Which pipelines must have test leads and what must I do to install and maintain the leads?**

... (c) *Maintenance.* You must maintain the test lead wires in a condition that enables you to obtain electrical measurements to determine whether cathodic protection complies with § 195.571.

Four corrosion control test leads were not maintained on the Transandy Pipeline. Test leads at station nos. 529+95, 684+73, 1061+42, and 1090+01 have been missing since the October, 2003 survey.

4. **§195.573 What must I do to monitor external corrosion control?**

... (c) *Rectifiers and other devices.* You must electrically check for proper performance each device in the first column at the frequency stated in the second column.

Device	Check Frequency
Rectifier	At least six times each calendar year, but with intervals not exceeding 2 ½ months
Reverse current switch	
Diode	
Interference bond whose failure would jeopardize structural protection	

.....

MarkWest did not electrically inspect an interference bond located near the Maytown extraction facility, whose failure would jeopardize structural protection of a coated pipeline segment on the Maytown to Ranger Pipeline at Highway 80, between the years 2000 and 2005. This unknown bond was discovered by MarkWest during a 2005 stray current survey.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violations persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Be advised that failure to do so will result in MarkWest being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 2-2007-5001W**.

Sincerely,



LD
Linda Daugherty
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration

