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October 1, 2007

Mr. Ivan A. Huntoon
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
901 Locust St., RM 462
Kansas City, MO 64106-2641

RE: CPF No. 3-2007-5024
Notice of Probable Violation and Proposed Civil Penalty

Dear Mr. Huntoon:

Marathon Pipe Line LLC ("MPL") is in receipt of your Notice of Probable Violation ("NOV") and Proposed Civil Penalty ("PCP") letter dated September 5, 2007. Each of the proposed violations listed in the NOV and PCP have been addressed. The actions taken by MPL are discussed in detail below.

1. §195.412 Inspection of rights-of-way and crossings under navigable waters.

MPL began foot patrol of less than one mile of ROW in the vicinity of Breckenridge Drive, Power Drive, Doty Lane, and Bridger Drive North in Carmel, IN, on May 11, 2007. The foot patrol continued every 14 days until the vegetation in the ROW was cleared on July 17, 2007. Routine aerial patrol has resumed.

2. §195.420 Valve maintenance.

On December 14, 2006, MPL excavated the AMO main line block valve on the RIO 8" Pipeline system and replaced the faulty valve stem extension with a redesigned, properly sealed extension. Also, MPL is determining a method of identifying additional valves which may have a similar seal design as the failed stem seal.

3. §195.563 Which pipelines must have cathodic protection?

Bonds were installed across flanges which had insulated the new relief line at Robinson, IL from the existing groundbed and rectifier on Friday, July 28, 2006. Test points were added to MPL's Corrosion database, and readings were collected the same day of bond installation. To confirm the integrity of the new relief line, an External Corrosion Direct Assessment (CIS, DCVG and random bell hole excavations) will be completed in 2007. Also, MPL's standard MPLMNT020 "MPL Corrosion Control Process" has been revised to address the application of cathodic protection not later than one year after construction, relocation or replacement of MPL pipelines.

4. §195.575 Which facilities must I electrically isolate and what inspections, tests, and safeguards are required?

Test points were installed and added to MPL's corrosion database for the casing at 1561+66 on the RIO 8" Products system on March 19, 2007. Test points were installed and added to MPL's corrosion database for the casing at 3771+84 on the Martinsville-Lima 22" Crude system on March 16, 2007. Readings were taken the same day as test point installation for each respective casing. Also, MPL's standard MPLMNT069 "Managing Inline Inspection Data" has been revised to give guidance for the identification of all casings.

5. §195.589 What corrosion control information do I have to maintain?

With regard to external corrosion, the exposure at 150+32 on the 4" LPG was remediated on August 28, 2006. The required external corrosion inspection was documented on a Land & Pipe Management Report (LPMR) form. Also, MPLMNT111 - "Depth of Cover Maintenance Process" has been created, and the required training was completed June 30, 2007. This standard outlines the responsibilities of all parties involved in a depth of cover concern or the discovery of a new exposure. Also, other standards involving the Corrosion Control process and the Damage Prevention & ROW Relations process have been revised. The revisions include improvements to data collection requirements, a modified Land & Pipe Management Report (LPMR) form with required data field check points, clarification of roles and responsibilities, and internal audit procedures. Responsible positions were identified for each of the revised standards and training has been completed.

With regard to internal corrosion, a Compliance Alert was distributed on June 15, 2006 stating that any time the internal surface of a DOT-regulated pipeline system is exposed the internal surface of the pipe shall be inspected for evidence of internal corrosion. Drain lines, thermal relief lines and any pipe 2" or less in diameter are excluded.

6. §195.583 What must I do to monitor atmospheric corrosion control?

All exposures identified in the NOV have been inspected and added to MPL's ACC database. MPL standard MPLMNT092 "Atmospheric Corrosion Control Process" is being revised to address items which may not currently be in the ACC database (ie: exposures and appurtenances which are exposed to the atmosphere). The revisions are scheduled to be completed by October 15, 2007. Also, MPL standard MPLMNT119 "Atmospheric Corrosion Control Inspection" is being revised to address the inspection of elevated piping and the inspection of piping under insulation. This standard is targeted for completion by December 30, 2007.

While MPL has policies and procedures in place to achieve our objectives of protection of the public, employees and the environment, we constantly strive for continuous improvement. Active participation with government agencies is one manner in which we can improve our processes. As such, MPL understands the enormous responsibility PHMSA has been charged with to ensure the safety of hazardous liquid pipelines. We appreciate the professionalism shown by your staff during these audits, through which MPL and PHMSA (Central Region) have developed a good working relationship. We hope to further this relationship with ongoing open dialogue.

Please note, MPL has initiated a wire transfer (Fed Ref # 0926-001522) for payment in full of the proposed civil penalties. We request that if CPF No. 3-2007-5024 is made available on the PHMSA website, this reply be posted as well.

Sincerely,



Craig Pierson
Marathon Pipe Line LLC
Vice President of Operations