

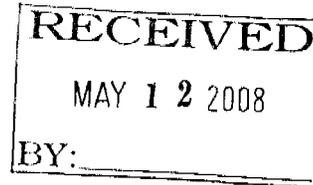


Marathon Pipe Line LLC

539 South Main Street
Findlay, OH 45840
Telephone: (419) 421-3385

May 7, 2008

Mr. R. M. Seeley, Director
Southwest Region, Office of Pipeline and Hazardous Materials
Safety Administration
8701 South Gessner, Suite 1110
Houston, TX 77074



Re: Notice of Amendment Resolution
CPF 4-2008-5013M

Dear Mr. Seeley:

Marathon Pipe Line LLC (Operator ID 32147) received a Notice of Amendment (NOA), CPF 4-2008-5013M, on April 11, 2008 in response to a headquarter inspection of our Integrity Management Program (IMP), in Findlay, Ohio. The inspection was conducted by representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) on May 7-11 and May 21-25, 2007. Marathon Pipe Line LLC (MPL) will address the advice and amendments within MPL plans and procedures.

The modifications listed in the NOA will be addressed and incorporated into the appropriate policies and plans of the MPL IMP. A description of each specific response, including revisions, is explained on the following 2 pages. An electronic copy of this letter and the enclosed amendments are provided on an enclosed compact disk.

MPL provided through a July 31, 2007 meeting and report, finalized documentation in regard to items 1B, 2 and 5, to the satisfaction of PHMSA and these items have been finalized, as noted in the NOA. No further action is required by PHMSA on the part of MPL in regard to these items. Therefore, those items will not be addressed in this communication.

MPL is fully committed to the working relationship with PHMSA and state agencies to insure that the public and the environment are protected. MPL welcomes the advice and guidance of PHMSA to ensure compliance with 49 CFR § 195.452. Our responses to the NOA are believed to satisfy the requirements of 49 CFR § 195.452 and the advice and amendments addressed by PHMSA.

Sincerely,

Craig O. Pierson
Vice President Operations
Marathon Pipe Line LLC
539 South Main Street
Findlay, Ohio 45840

CC: Joseph Baker, President, Marathon Pipe Line, LLC

MPL Responses to Notice of Amendment - CPF 4-2008-5013M

NOA Item No. – 1A

NOA Instructions

- A. **MPL must modify its application for using the averaged multi-threat Likelihood of Failure (LOF) of a pipeline segment for calculating an Overall Consequence Score to more accurately calculate the Release Volume Score and characterize the potential consequences to specific HCAs. MPL's DRAS risk model uses the multi-threat averaged/normalized/weighted release volume as part of the Release Volume Score portion, and it is then multiplied by the threat-specific Total Threat Score to arrive at Total Risk Scores or Risk of Failure (ROF). Using the averaged LOF for calculation the final ROF score is inconsistent and appears to result in overall scores that will underestimate the maximum Release Volume Score and inadequately characterize the potential consequences to specific HCAs.**

MPL Response to NOA

MPL will, over the next 18 months, modify the relative risk algorithm and secure vendor software updates to align consequence with specific threats. The preliminary steps to improve this process were initiated in February 2008.

NOA Item No. – 1C

NOA Instructions

- C. **MPL must modify its process that relies on a ten-year rolling average of specific leak history to determine risk algorithm threat category weightings particularly for threats that may not occur frequently but have the potential for substantial releases to adequately characterize the potential consequences to affected HCAs.**

MPL Response to NOA

MPL will adjust its process for the determination of risk algorithm threat category weightings to include the consideration of industry release frequency data, in addition to the MPL 10 year rolling average leak history. This will be completed by October 1, 2008.

NOA Item No. – 3

3. **MPL must add sufficient specificity to the process for integrating IM data in the periodic evaluation to ensure consistent application. Periodic Evaluation must consider a wide range of available information and risk factors specific to its pipeline system.**

MPL Response to NOA

MPL is assembling an IMP skills team to meet quarterly. The team will consist of the IMP subject matter experts (SME). The team will discuss the wide range of information, when available from evaluated pipeline systems to ensure not only consistent application but that each SME group is knowledgeable on information from other SME information silos on all discussed systems.

NOA Item No. – 4

4. MPL must modify the ECDA process to provide for directly assessing above ground pipeline segments that could impact an HCA. Application of a ECDA "region" for above-ground piping is not consistent with rule defined ECDA process for below-ground piping per the NACE RP0502-2002 standard and such approach is considered to be "other technology" that require a notification to PHMSA. Technical justify must be provided for processes such as these to ensure the integrity assessment method appropriately assesses the integrity of a specific pipeline segment.

MPL Response to NOA

The ECDA Process that provides for direct assessment of pipeline segments that could affect an HCA is MPL standard MPLMNT127. On September 12, 2007, that standard was revised to remove "above ground pipeline segments" from its scope. The standard has been revised and states "this standard covers the four step process for implementing ECDA on buried, steel, onshore pipelines of any age and vintage in accordance with the NACE Recommended Practice 0502-2002 titled Pipeline External Corrosion Direct Assessment Methodology". Above ground pipe segments that could impact an HCA are assessed consistent with other pipe segments per MPL Integrity Management Program.

NOA Item No. – 6

6. MPL must modify section MPLMNT127 of their IMP manual to include "more restrictive criteria" requirement for all first time ECDA application. Currently, the process only requires more restrictive criteria for lines with a poor corrosion control history. The 195.588 and NACE 0502-2002 requirements are for more restrictive criteria to be applied to all first-time applications of ECDA as an assessment method without regards to the pipe's history.

MPL Response to NOA

The ECDA Process is detailed at MPL Standard MPLMNT127. On September 12, 2007, that standard was revised to state "When ECDA is applied for the first time on a pipeline, more stringent requirements apply. These requirements include but are not limited to additional data collection, indirect examinations, direct examinations, and post-assessment activities."