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August 16, 2012

Mr. Dennis Hinnah  
Deputy Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
188 W. Northern Lights Blvd., Suite 520  
Anchorage, AK 99503

Re: CPF 5-2012-0016M

Dear Mr. Hinnah:

This letter contains Marathon Oil Company's (MOC) response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA) June 1, 2012, Notice of Amendment (NOA) sent by your office, which identified two inadequacies found within MOC's Public Awareness Program during an April 26, 2012, inspection.

MOC's plan to address PHMSA's written comments has been completed. Accompanying this letter are new copies of the Public Awareness Program, which MOC feels will satisfactorily address PHMSA's concerns. These changes were completed by MOC North American Production Operations DOT Coordinator Kai Nielson and MPL Communications Specialist Craig Potts. Please find below a summary of PHMSA's NOA comments (in *italics*) followed by our responses.

1. *MOC submitted Marathon Pipe Line's PAP to satisfy the requirements of § 192.6 16, but these procedures gave no indication that MOC's facilities and operations were included in the plan. The PAP must state that MOC's facilities and operations are covered by the plan.*

MOC Response

Marathon Pipe Line's PAP has been amended to include the MOC facilities and operations directly in the plan rather than by written contract.

2. *The PAP does not list or assess the following unique attributes and characteristics of MOC's facilities:*
  - 1) *The PAP does not list MOC's assets;*
  - 2) *The PAP does not identify areas where non-odorized gas is transported;*
  - 3) *The PAP does not list the location of compressor stations; and*
  - 4) *The PAP does not list the locations of storage fields.*

*MOC's PAP must assess the unique attributes of their pipeline system, and must inform the affected stakeholder audience of areas where MOC's gas is not odorized.*

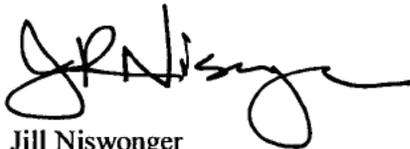
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MOC Response

Appendix A of the PAP has been updated to include all DOT assets in addition to indicating if the lines are non-odorized. Additionally any compressor stations or storage fields that are directly associated with the DOT lines have been identified and unique attributes assessed.

MOC feels with the changes outlined, the concerns expressed by PHMSA in its Notice of Amendment have been addressed. Your comments or suggestions for further improvement are always welcome.

Sincerely,



Jill Niswonger  
Marathon Oil Company  
Midstream DOT Coordinator

cc: G. Watkins  
J. Bowzer  
B. Hutchison  
W. Hutchings  
C. Keppers  
C. Truby  
S. Worthen  
K. Nielson  
C. Potts  
R. Abraham

Attachments:

1. MPL Public Awareness Program Text
2. MPL Public Awareness Program Appendix A

**Marathon Pipe Line LLC  
Public Awareness Program (PAP)**

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## **Marathon Pipe Line LLC Public Awareness Program (PAP)**

### **Background**

Marathon Pipe Line (MPL) has been delivering pipeline public awareness and damage prevention information to excavators, emergency officials, local public officials and the public for many years. These communications have been performed in compliance with the following DOT 49 Code of Federal Regulations:

Part 195.440 and Part 192.616 – Public education.

Part 195.402(c)(12) and Part 192.615(c) – Establishing and maintaining liaison with Fire, Police, and other appropriate Public Officials.

Part 195.402(e)(7) and Part 192.615(a)(8) – Coordinating with agencies preplanned and actual responses during an emergency.

Part 195.442 and part 192.614 – Damage Prevention Program.

In an effort to enhance public safety and environmental protection, Congress passed the Pipeline Safety Improvement Act of 2002 which required pipeline operators to review their public education plans for effectiveness and modify the program as necessary. The American Petroleum Institute (API) issued recommended practice (RP1162), “Public Awareness Programs for Pipeline Operators” in 2003. The API RP1162 was incorporated into federal regulation by reference. This regulation requires pipeline operators to develop, maintain and enhance their documented public awareness program. In 2006, MPL developed its Public Awareness Program (PAP) and submitted it to the Public Awareness Program Clearinghouse in October of that year (confirmation number – 778). In January 2008, MPL received confirmation from John Jacobi (PHMSA) that its PAP was compliant.

### **Section 1: Program Objectives**

The objectives of MPL’s program are listed below:

- Raise stakeholders’ awareness of the presence of pipelines in their community and the role pipelines play in transporting energy.
- Help stakeholders understand that pipelines are a safe mode of transportation.
- Help the stakeholders understand how to recognize a pipeline release and what steps should be taken to prevent and respond to pipeline emergencies.
- Raise public awareness of the requirement to “Call Before You Dig” when involved in any excavation work and promote the use of 811, the national one call number.
- Help excavators understand the steps that they should take to prevent third-party damage and respond properly if they cause damage to a pipeline.
- Help emergency response personnel understand the proper actions to take in responding to a pipeline emergency.

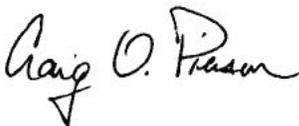
# Marathon Pipe Line LLC Public Awareness Program (PAP)

## **Section 2: Management Support**

As MPL continues its unwavering commitment to employee, contractor, and public safety, it is clear that Public Awareness plays an integral role in ensuring that safety. As President of Marathon Pipe Line, I recognize that MPL's efforts to heighten awareness of our pipelines, their operation, and the potential dangers from unauthorized activity around pipelines benefits the Industry and the communities in which we operate as a whole. Personally, I know that educating all of our stakeholders and building better relationships with our pipeline neighbors is work that can ultimately save lives. I stand firmly behind my commitment to Public Awareness and Damage Prevention and resolute in my promise to support MPL programs and activities that further these causes.

As a company, MPL's Regulatory Compliance Philosophy states that "Regulatory compliance is not an option" and therefore we fully support the policies, goals and objectives of RP 1162 and have created this Pipeline Public Awareness Plan to fully comply with those recommended practices. We are committed to educating the people that live and work near our pipelines on the things they can do to contribute to their personal safety. We are also committed to providing resources, including funding, necessary for implementing and managing the plan.

I challenge all employees to look for opportunities to add their voice to MPL's message because every employee can be an ambassador of the shared goals of Public Awareness and Damage Prevention. Both programs are critical to the continued safe operation of our pipelines and to ensuring the safety of the public.



Craig O. Pierson  
President, Marathon Pipe Line

## **Section 3: Program Administration**

### **Program Administrator**

Marathon Pipe Line has designated the Communications Specialist within the Damage Prevention Department as the Program Administrator.

### **Roles and Responsibilities**

#### **Communications Specialist –**

- 1) The Specialist shall be responsible for the development, coordination, and enhancement of the PAP.

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- 2) The Specialist shall be responsible for managing the public awareness budget within the Damage Prevention budget.
- 3) The Specialist shall be responsible for determining the assets included within the program, identifying the stakeholder audiences, determining the messages, delivery methods and frequency of contact.
- 4) The Specialist shall be responsible for coordinating pipeline public awareness meetings in which MPL is participating.
- 5) The Specialist shall ensure an adequate inventory of printed damage prevention publications and specialty advertising items are available for distribution.
- 6) The Specialist shall be responsible for planning and coordinating mailings to stakeholder audiences.
- 7) The Specialist shall be responsible for maintaining and enhancing the public awareness sections of the external MPL web site.
- 8) The Specialist shall be responsible for assisting Operations Supervisors in planning and conducting facility open house/tours.
- 9) The Specialist shall be responsible for conducting public awareness training of Operations Supervisors and other MPL personnel responsible for conducting public awareness activities.
- 10) The Specialist shall be responsible for compiling all records and documentation relating to MPL's public awareness activities. These records may include documentation from vendors, industry associations, One Call Centers, MPL personnel or others.
- 11) The Specialist shall be responsible for entering records and documentation of MPL's public awareness activities into the public awareness information system (database). Once entered, the Specialist shall store the hardcopy documentation in Title & Contract.
- 12) The Specialist shall be responsible for contracting third-party vendors, as needed, to fulfill the requirements of the PAP.
- 13) The Specialist shall be responsible for measuring the effectiveness of the PAP and based on the findings, determine what supplemental activities should be implemented.
- 14) The Specialist shall maintain close liaison with state One Call Centers and pipeline associations in order to stay abreast of their outreach to stakeholder audiences and determine MPL's level of participation.
- 15) The Specialist shall participate in industry-led public awareness/damage prevention efforts.

**Operations Supervisors –**

- 1) The Operations Supervisor or his/her designee shall be responsible for attending and participating in scheduled pipeline awareness meetings/presentations in their designated area.
- 2) The Operations Supervisor or his/her designee shall be responsible for documenting public awareness activities in their designated area and submitting the documentation to the program administrator.
- 3) The Operations Supervisor shall be responsible for planning and conducting a facility open house/tour when required.

**HES Professionals –**

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- 4) The HES Professionals assigned the public awareness responsibility for the Catlettsburg refinery shall be responsible for attending scheduled pipeline safety meetings for their designated asset.

### **Operations Superintendents –**

- 1) The Operations Superintendents shall support the PAP by gaining approval from the Region Manager to utilize region resources.
- 2) The Operations Superintendent shall be responsible for determining which operating area will conduct the required annual open house/tour per region.

### **Training**

Employees who have public awareness responsibilities are required to review the online “Communicating Pipeline Public Awareness” training every 36 months. The Human Resources and Training Department (HRTD) is responsible for scheduling employee training. The “Communicating Pipeline Public Awareness” presentation is included in Appendix G.

### **Section 4: Identification of Pipeline Assets**

This PAP applies to all pipeline assets operated by Marathon Pipe Line and Marathon Oil assets in which MPL has been assigned the responsibility of conducting public awareness activities. Appendix A provides a listing of assets covered by the PAP.

### **Section 5: Stakeholder Audiences**

Stakeholder identification is determined by SIC Codes (Appendix B) and through the Title & Contract landowner database. The selected SIC Codes generally correspond to the four (4) general stakeholder audiences identified in API RP1162. These stakeholder audiences are:

- **Affected public** – residents, tenants, farmers, places of congregation (businesses, schools, etc.), homeowner associations, neighborhood organizations along the pipeline right of way.
- **Emergency officials** – fire, police, and sheriff departments, State and County Emergency Management Agencies (EMA) and Local Emergency Planning Committees (LEPCs), **911 Dispatch Centers**.
- **Local public officials** – planning and zoning boards, licensing/permitting departments, building code enforcement departments, city and county managers, elected officials and governing councils.
- **Excavators** – contractors, construction companies, excavation equipment rental companies, public works officials, public street, road and highway maintenance and construction departments, timber companies, fence building companies, drain tiling

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companies, landscapers, well drillers, home builders, land developers, real estate sales agents and one call centers.

**Section 6: Message Type and Content**

Table 6.1 below provides a summary of the required baseline messages for each stakeholder audience. MPL will communicate these messages to the appropriate stakeholder group.

BASELINE MESSAGES	TRANSMISSION OPERATORS				GATHERING PIPELINE OPERATORS			
	Affected Public	Emergency Officials	Public Officials	Excavators/ Contractors	Affected Public	Emergency Officials	Public Officials	Excavators/ Contractors
Damage prevention awareness	X			X	X			X
Emergency Preparedness Communications		X	X			X		
Hazard Awareness and Prevention Measures	X	X	X	X	X	X	X	X
Information available through the National Pipeline Mapping System	X	X	X					
How to obtain additional information	X	X	X	X	X	X	X	X
Leak recognition and response	X			X	X			X
One call requirements	X		X	X	X			X
Pipeline location information	X	X	X			X	X	X
Pipeline purpose and reliability (including gathering lines)	X	X	X	X	X	X	X	X
Potential Hazards		X				X		
Copies of materials provided to affected public and emergency officials							X	
Company contact information	X	X	X	X	X	X	X	X

BASELINE MESSAGES	LOCAL NATURAL GAS DISTRIBUTION COMPANIES			
	Residents Along the Local Distribution	Emergency Officials	Public Officials	Excavators/Contractors

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	System*			
Damage prevention awareness	X			X
Emergency Preparedness Communications		X	X	
Hazard Awareness and Prevention Measures	X	X	X	X
Information available through the National Pipeline Mapping System	X	X	X	
How to obtain additional information	X	X	X	X
Leak recognition and response	X			X
One call requirements	X		X	X
Pipeline location information	X	X	X	
Pipeline purpose and reliability (including gathering lines)	X	X	X	X
Potential Hazards		X		
Copies of materials provided to affected public and emergency officials				
Company contact information	X	X	X	X

\*Residents Along the Local Distribution System – Marathon Pipe Line owns and operates natural gas pipelines that have been classified as Distribution per 49 CFR §192. Marathon Petroleum Company is the only “customer” of the natural gas from these distribution lines; therefore, bill stuffers would not be appropriate. On an annual basis, MPL sends targeted mailings to residents that live along the right of way to cover the messages listed in the table above.

**Message Pre-testing**

Whether participating in a collaborative mailing program or a MPL sponsored mailing, the required baseline messages will be pre-tested for understandability before production and mailing. If the program is a collaborative mailing, MPL will require the vendor to conduct message pre-testing and provide documentation of the testing and findings. If the program is a MPL-only mailing, the Communications Specialist will be responsible for pre-testing the messages. This will be accomplished through an internal review, stakeholder focus group or survey. Documentation of the MPL message pre-testing will be added to the PAP and recorded in the Summary of Program Modifications document.

**Other Languages**

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The PAP will be conducted in English and in other languages commonly understood by a significant number and concentration of non-English speaking people. MPL will use the same criteria as the U.S. Voting Rights Act to determine if communications in a non-English language is required. According to the Act, if more than 5% of all voting citizens are unable to speak or understand English well enough to vote, then ballots must be produced in a language common to that group.

MPL's baseline mailing will be conducted in both English and Spanish. On an annual basis, the mailing vendor will provide MPL a zip code demographic report detailing the percentage of non-English speaking people by county. The Communications Specialist will be responsible for reviewing this data.

If the percentage of non-English (other than Spanish) speaking individuals by county is 5% or greater, MPL will communicate with the Affected Public in the appropriate non-English language in the next mailing cycle. The Communications Specialist will annually document the review of the demographic data and any changes in language for future mailings in the Summary of Program Modifications document.

### **Section 7: Delivery Frequency**

Table 7.1 below provides a summary of the baseline delivery frequency MPL will utilize for each stakeholder audience.

<b>Stakeholder Audience</b>	<b>Baseline Delivery Frequency</b>
Affected Public	- 2 years; annual for distribution pipelines
Emergency Officials	- Annual
Local Public Officials	- 3 years
Excavators	- Annual

### **Section 8: Delivery Methods**

Table 8.1 below provides a summary of delivery methods MPL may utilize for each stakeholder audience.

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Stakeholder Audience	Delivery Methods
Affected Public	<ul style="list-style-type: none"> <li>- Targeted distribution of print materials</li> <li>- Pipeline markers</li> <li>- Company web site</li> <li>- Giveaway items</li> </ul>
Emergency Officials	<ul style="list-style-type: none"> <li>- Group meetings</li> <li>- Facility tour/open house</li> <li>- One Call Center outreach</li> <li>- Targeted distribution of print materials</li> <li>- Pipeline maps</li> <li>- Company web site</li> <li>- Personal contact</li> <li>- Giveaway items</li> <li>- <b>Drills</b></li> </ul>
Local Public Officials	<ul style="list-style-type: none"> <li>- Targeted distribution of print materials</li> <li>- Group meetings</li> <li>- Facility tour/open house</li> <li>- Company web site</li> <li>- Giveaway items</li> </ul>
Excavators	<ul style="list-style-type: none"> <li>- Targeted distribution of print materials</li> <li>- Pipeline markers</li> <li>- One Call Center outreach</li> <li>- Company web site</li> <li>- Group meetings</li> <li>- Giveaway items</li> </ul>

**Affected Public**

- 1) A publication that incorporates all the required baseline messages for this audience will be mailed on a state-by-state basis every other year (annually for distribution pipelines). Centerline buffers for the mailing will be ¼ mile (1,320 feet) on each side of the pipe. Documentation of the mailing will be provided to MPL by the vendor conducting the mailing.

**Emergency Officials**

- 1) On an annual basis, local MPL personnel will attend group meetings in their designated area for emergency responders. These meetings are organized and conducted by state One Call Centers, pipeline associations, or other vendors. The required baseline messages for this stakeholder audience will be shared during the meeting. In discussions with emergency responders, MPL area personnel should communicate the items listed in the “Public Awareness Talking Points Form”. MPL personnel should distribute the “A Guideline for Emergency Responder Agencies” brochure and giveaway items when meeting with emergency officials. Documentation of the meeting will be provided to MPL by the hosting vendor. If attendance at a public awareness meeting is determined not to be feasible or effective, a publication that incorporates all the required baseline messages for this audience will be mailed. The publication will be mailed to emergency officials within a county where a MPL operated pipeline exists. Documentation of the mailing will be provided to MPL by the vendor conducting the mailing.

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- 2) On an annual basis, each region will host an open house for local emergency officials and public officials. The open house should include a tour of a MPL facility and sharing of pipeline safety information. Facility tours promote emergency preparedness and provide current knowledge of facility operations for emergency responders. MPL personnel should document this contact by completing the Public Awareness Contact Form (PACMPL) and the Report on Emergency Responder Form (RERMPL).

### **Local Public Officials**

- 1) A publication that incorporates all the required baseline messages for this audience will be mailed on a state-by-state basis every three years. The publication will be mailed to public officials within a county where a MPL operated pipeline exists. Documentation of the mailing will be provided to MPL by the vendor conducting the mailing.
- 2) On an annual basis, each region will host an open house for local emergency officials and public officials. The open house should include a tour of a MPL facility and information sharing about pipeline safety. MPL personnel should document this contact by completing the Public Awareness Contact Form (PACMPL).

### **Excavators**

- 1) A publication that incorporates all the required baseline messages for this audience will be mailed annually. The publication will be mailed to excavators within a county where a MPL operated pipeline exists. **If a pipeline is within 25 miles of an adjacent county, excavators in that county will be included in the mailing.** Documentation of the mailing will be provided to MPL by the vendor conducting the mailing.
- 2) Where available, local MPL personnel will attend pipeline awareness meetings for excavators/contractors organized by state One Call Centers, pipeline associations or vendors. MPL personnel should distribute the “Property Development Specifications” brochure and giveaway items when meeting with excavators. Documentation of the meeting will be provided to MPL by the hosting vendor.

### **Mailing List Verification**

On an annual basis, MPL will verify the accuracy of its mailing list by utilizing the following process:

In the first quarter of every year, the Communications Specialist will obtain a list of landowners and excavators who did not make a one call prior to excavating during the previous year. The list, generated from field incident reports, is maintained by the Field Services & Planning Department. The Communications Specialist will submit the list to the public awareness mailing vendor. The vendor will verify that the addresses were included in the most recent mailing for that stakeholder audience. If any addresses were not included, the vendor will enter the addresses into a MPL database. These addresses will then be included in future MPL mailings for that stakeholder audience.

**The Communications Specialist will randomly select a mile section of pipeline to conduct a physical comparison to the vendor mailing list. Within the mile section, a One Call Activity**

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Monitor for that area will document the physical addresses within 1/8 of a mile of the pipeline. The Monitor will provide the list to the Communications Specialist. The Communications Specialist will compare the actual physical listing to the mailing list provided by the mailing vendor. If any physical addresses were not included in the latest mailing, the vendor will enter the addresses into a MPL database. These addresses will then be included in future MPL mailings for that stakeholder audience. The vendor will also mail the most recent communications to any missed addresses. The Communications Specialist will document the verification process and add it to the PAP.

For non-collaborative mailings, the Communications Specialist will verify that the number of pieces mailed to stakeholders by the vendor matches the number of pieces on the billing invoice. The Communications Specialist will document the verification process and add it to the PAP.

### **Giveaway Items**

MPL uses assorted promotional giveaway items and other communication materials to increase damage prevention awareness among the Affected Public, Emergency Officials, Excavators and Local Public Officials. These items are available to MPL personnel for distribution to appropriate stakeholders. Employees can order giveaway items and communication materials electronically at <http://few.mgroupnet.com/Search.asp>.

### **Documentation**

Public awareness forms are included in Appendix C. Any external public awareness communication, which does not occur on the right of way, should be documented on a Public Awareness Contact Form (PACMPL) and submitted to the program administrator. This includes communication initiated by MPL personnel to stakeholders and communication from stakeholders to MPL. Public awareness communication on the right of way should be documented on a Land & Pipe Management Form (PLLPMR) and filed in Title & Contract.

Public awareness documentation will be entered into the public awareness information system (database) and hardcopies stored in Title & Contract and retained for five years.

## **Section 9: Considerations for Supplemental Program Enhancements**

This section provides guidance on how Marathon Pipe Line **will** enhance its baseline program with supplemental components. The term “program enhancement” refers to MPL’s decision to supplement its Public Awareness Program beyond the baseline.

Three primary forms of enhancement **should** be considered for all stakeholder audiences in the development and administration of the Public Awareness Program:

### **Increased Frequency (shorter interval)**

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Increased frequency refers to providing communications to specific stakeholder audiences on a more frequent basis than the recommended baseline for the intended audience.

### **Enhanced Message Content and Delivery/Media Efforts**

Enhanced message content and delivery/media efforts refer to providing additional or supplemental communications activities beyond those identified in the baseline. This could include customized and/or additional messages, or different delivery methods.

### **Coverage Areas**

Coverage areas refer to broadening or widening the stakeholder audience coverage area beyond those contained in the baseline. It can also be applied to widening the buffer distance for reaching a particular stakeholder audience along the pipeline route.

Regarding program enhancements and possible supplemental activities, Marathon Pipe Line **will** consider the following factors applied along the entire route of the pipeline system:

- Potential hazards
- High consequence areas
- Population density
- Land development activity
- Farming activity
- Third-party damage incidents (MPL specific and national statistics)
- Environmental considerations
- Pipeline history in an area
- Specific local situations
- Regulatory requirements
- Results from previous public awareness program evaluations
- MPL hit and near miss data
- Effectiveness measurements
- Other relevant factors (PPTS advisories; PHMSA bulletins, etc.)

Marathon Pipe Line **will** also consider potential program enhancements when the following conditions are present:

### **Affected Public**

- An elevated potential exist for third-party damage.
- The pipeline runs through heavily developed urban areas that are more likely to have a frequently changing population than a more stable, less dense suburban or rural areas.
- Right-of-way encroachments have occurred frequently.
- The potential for concern about consequences of a pipeline emergency is heightened.

### **Public Officials**

- Heightened public sensitivity to pipeline emergencies exists in the area, independent of cause or which operator was involved.
- Significant right-of-way encroachments (such as new construction developments) are occurring.

## **Marathon Pipe Line LLC Public Awareness Program (PAP)**

### **Emergency Officials**

- Emergency officials have heightened sensitivity to pipeline emergencies.
- After post-emergency review or where there's potential for enhanced "liaison activities" between the operator and emergency officials that could have improved the emergency response to a pipeline emergency.
- Emergency officials request additional communications.

### **Excavators/Contractors and One Call Centers**

- There are instances that indicate an elevated potential for third-party damage.
- Developers and contractors are performing a high number of excavations along a pipeline route in developing areas.
- There are instances of problems identified with excavators' use or lack of use of the One Call System.

A summary of program enhancements are included in Appendix F.

## **Section 10: Program Evaluation**

The primary purposes of the evaluations are to:

- Assess whether the current program is effective in achieving the defined objectives in Section 1: Program Objectives, and
- Provide MPL with information on implementing improvements in its Public Awareness Program effectiveness based on findings from the evaluations.

### **Measuring Program Implementation**

On an annual basis, the Communications Specialist will be responsible to ensure the Public Awareness Program is audited for proper development and implementation. This will be accomplished through an internal self-assessment, third-party audit or regulatory inspection. The Self-Assessment of Program Implementation form will be used when conducting an internal self-assessment. The internal self-assessment will be conducted by an MPL employee, not the Communications Specialist. Documentation of the annual audit will be added to the PAP under Appendix D and recorded in the Summary of Program Modifications document.

### **Measuring Program Effectiveness**

The Communications Specialist is responsible to ensure effectiveness measurements are conducted no more than 4 years apart. MPL will use a variety of methods to measure effectiveness. These include, but are not limited to, interviews, surveys and focus group sessions.

MPL will use the following 4 measures to evaluate program effectiveness:

- Measure 1 – Outreach: Percentage of each intended audience reached with the desired messages

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- Measure 2 - Understandability of the content of the message
- Measure 3 - Desired behaviors by the intended stakeholder audience
- Measure 4 – Achieving bottom-line results

Findings from effectiveness measurements will be documented and added to the Summary of Program Modifications document. A listing of completed effectiveness measurements is included in Appendix E. Marathon Pipe Line will monitor and evaluate the effectiveness of the PAP and implement enhancements as necessary to achieve continuous improvement.

### **Annual Program Review**

In the first quarter of every year, the Communications Specialist will be responsible for conducting a comprehensive review of the Public Awareness Program. The Specialist will review the public awareness data from the previous year. This includes review of the annual assessment, any surveys or focus group data, public awareness meeting and mailing data, information from field locations, and any other pertinent data. The Specialist will record effectiveness measurements from mailings, meetings and survey data in the Public Awareness Metrics document. The document will capture the most pertinent information from business reply cards; survey data, meeting attendance, and damage/near-miss statistics.

### **Trigger for Supplemental Activity**

After populating the Public Awareness Metrics document, the Communications Specialist will compare MPL effectiveness measurements against industry measurements. If in a given year, MPL ranks below the industry average in two effectiveness measurements for a specific stakeholder audience, an automatic supplemental activity will be required. If only one effectiveness measurement is available, MPL must rank below the industry average by more than the median margin of error for the measurement to trigger a supplemental activity. The required supplemental activity will be conducted in the next calendar year following the annual program review. MPL may choose to conduct a supplemental activity, even if its effectiveness measurements are equal or greater than the industry average.

The Communications Specialist will document the annual program review and any planned supplemental activity in the Summary of Program Modifications document.

## **Appendix A: Assets**

### **1) Alaska Operations/ Kenai, AK**

#### **Beaver Creek Field DOT Assets**

- Beaver Creek Pad 1A - Beaver Creek Enstar Junction (12")

Beaver Creek DOT line associated attributes:

- All gas non-odorized (ensure stakeholders informed of non-odorized gas in the area)
- Beaver Creek Pad 1A non-DOT regulated combustion engines/turbines include:
  - Engine #1 (pipeline quality natural gas fueled) 402 hp, Make: Waukesha Series VFG, Model: F18GL HCR
  - Engine #2 (pipeline quality natural gas fueled) 402 hp, Make: Waukesha Series VFG, Model: F18GL HCR
  - Turbine #1 1200 hp, Make: Solar Model: Saturn 20
- No combustion engines/turbines at Beaver Creek Enstar Junction associated with DOT jurisdictional lines
- All non-DOT engines and turbines associated with the Beaver Creek DOT line are within areas with controlled access and have no known history of third party damage, thus there is no known elevated potential for third party damage, and no supplemental program enhancements are required.
- There is no gas storage associated with the Beaver Creek DOT line.

#### **Kenai Gas Field DOT Assets**

- Kenai Gas Field Pad 14-6 - Kenai Gas Field Pad 34-31 (16")
- Kenai Gas Field Pad 34-31 - Kenai Gas Field Pad 14-6 (12")
- Kenai Gas Field Pad 14-6 - Jump Over 6 Junction (20")
- Jump Over 6 Junction - Kenai Gas Field Pad 33-30 (20")
- Jump Over 6 Junction - Kenai Gas Field Pad 34-31 (12")
- Kenai Gas Field Pad 34-31 - Kenai Gas Field Pad 33-30 (16")
- Kenai Gas Field Pad 33-30 - Kenai Gas Field Pad 34-31 (12" LP)

Kenai Gas Field DOT line associated attributes:

- All gas non-odorized (ensure stakeholders informed of non-odorized gas in the area)
- Associated 14-6 pad non-DOT regulated combustion engines/turbines include:

- Engine #1 (pipeline quality natural gas fueled) 637 hp, Make: Caterpillar, Model G3406
- Engine #2 (pipeline quality natural gas fueled) 345 hp, Make: Caterpillar, Model G3412
- Turbine #1 3500 hp, Make: Solar, Model: Saturn
- Turbine #2 3500 hp, Make: Solar, Model: Saturn
- Turbine #3 3500 hp, Make: Solar, Model: Saturn
- Turbine #4 4500 hp, Make: Solar, Model: Centaur
- Turbine #5 4500 hp, Make: Solar, Model: Centaur
- Associated 34-31 Non-DOT regulated combustion engines/turbines include:
  - Engine #1 (liquid fuel) 340 hp, Make Cummins, Model: NT-855
  - Turbine #1 5278 hp, Make Allison, Model: 501-KC5
  - Turbine #2 5278 hp, Make Allison, Model: 501-KC5
- No internal combustion engines/turbines at Jump Over 6 Junction associated with the DOT jurisdictional lines
- No internal combustion engines/turbines at Kenai Gas Field Pad 33-30 associated with the DOT jurisdictional lines.
- All non-DOT engines and turbines associated with the Kenai gas field DOT lines are within areas of controlled access and have no known history of third party damage, thus there is no known elevated potential for third party damage, and no supplemental program enhancements are required.
- The Kenai gas field includes gas storage.

**Cannery Loop Field DOT Assets:**

- Cannery Loop #1 - KNPL Valve Box B 8" HP
- Cannery Loop #1 - Kenai Gas Field Pad 33-30 8" LP
- Cannery Loop #3 - KNPL Valve Box C 8"

Cannery Loop Field DOT line associated attributes:

- All gas non-odorized (ensure stakeholders informed of non-odorized gas in the area)
- No internal combustion engines/turbines in the Cannery Loop field directly associated with the DOT jurisdictional lines.
- There is no gas storage associated with the Cannery Loop DOT lines.

**West Fork Field**

- West Fork - West Fork Enstar Junction

West Fork Field DOT line associated attributes:

- All gas non-odorized (ensure stakeholders informed of non-odorized gas in the area)
- No internal combustion engines/turbines in the West Fork field associated with the DOT jurisdictional lines
- There is no gas storage associated with the DOT line located in the West Fork Field.

**Cook Inlet**

- Granite Point Production Facility - Spark Platform (6")
- Granite Point Junction - Granite Point Production Facility (3")

Cook Inlet DOT line associated attributes:

- All gas non-odorized (ensure stakeholders informed of non-odorized gas in the area)
- No internal combustion engines/turbines in the Cook Inlet associated with the DOT jurisdictional lines
- There is no gas storage associated with the Orphan Lateral DOT line.

**Other**

- Orphan Laterals
  1. CIGGS Valve Box M - Kenai Tesoro Meters 207/407 6"
  2. KNPL Valve Box I - Kenai Tesoro Meters 207/407 6"
  3. Kenai Tesoro Meters 207/407 - Kenai Tesoro 6"
  - All Orphan Laterals gas is non-odorized (ensure stakeholders informed)
  - No internal combustion engines/turbines associated with the DOT jurisdictional Orphan Laterals
  - There is no gas storage associated with the Orphan Lateral DOT lines.

**2) Fairfield Operations/ Fairfield, TX:**

**Oletha**

- Oletha Compressors - Oletha Atmos Junction #1 – (6")

Oletha DOT line associated attributes:

- All gas lines non-odorized (ensure stakeholders informed of non-odorized gas in the area)
- Associated Navatex Facility non-DOT regulated compressors include:
  - Compressor #1 (fuel gas fueled) 1663 hp, Caterpillar-G3606LE, Compressor Ariel JGD4
  - Compressor #2 (fuel gas fueled) 1663 hp, Caterpillar-G3606LE, Compressor Ariel JGD4
- All engines and turbines are within areas with controlled access from the general public.
- There are no gas storage fields associated with the Oletha DOT line.

## **Neuville**

- Neuville Compressor - Neuville Gulf South Junction - 6"

Neuville DOT line associated attributes:

- All gas lines non-odorized (ensure stakeholders informed)
- Associated Neuville Facility non-DOT regulated combustion engines/turbines include:
  - Engine #1 Make: CAT, Model G3304NA (80 CHP) driving an Ariel JGP 2-3, 3 stage configuration.
- All engines and turbines are within areas with controlled access by the general public.
- There are no gas storage fields associated with the Neuville DOT line.

### **3) Rocky Mountain Operations/ Price, UT:**

- Drunkard's Wash Processing - Drunkard's Wash Questar – (6") (inform stakeholders that line is non-odorized)

Drunkards Wash DOT line associated attributes:

- All gas lines non-odorized (ensure stakeholders informed)
- Associated Drunkards Wash Facility non-DOT regulated combustion engines/turbines include:
  - Engine #1 (fuel gas fueled) 1250 hp, Make: LE AFR, Model G3516TA
- All engines and turbines are within areas with controlled access from the general public.
- There are no gas storage fields associated with the Drunkards Wash DOT line.

*Updated 7/26/2012 by Kai Nielson, NAPO DOT Coordinator*

**Jill R. Niswonger**  
Midstream DOT Coordinator



**Marathon Oil Company**  
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Houston, TX 77056  
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August 16, 2012

**Mr. Dennis Hinnah**  
Deputy Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
188 W. Northern Lights Blvd., Suite 520  
Anchorage, AK 99503

Re: CPF 5-2012-0016M

Dear Mr. Hinnah:

Marathon Oil Company and Marathon Pipe Line believe the Attachments submitted as part of our responsive material qualify for confidential treatment under 5 U.S.C. 552(b) as they can be considered trade secrets or intellectual property. As required, a second copy of the document has been provided with the portion we believe qualifies for confidential treatment redacted.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Niswonger", with a long, sweeping horizontal line extending to the right.

Jill Niswonger  
Marathon Oil Company  
Midstream DOT Coordinator

cc: G. Watkins  
J. Bowzer  
B. Hutchison  
W. Hutchings  
C. Keppers  
C. Truby  
S. Worthen  
K. Nielson  
C. Potts  
R. Abraham