



Sunoco Logistics



Sunoco Logistics Partners L.P.
Twin Oaks Terminal
4041 Market St
Aston,
PA 19014-3197

VIA FEDERAL EXPRESS

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
Trenton, NJ, 08628

Attn: Mr. Byron Coy, Director, Eastern Region / Mr. Wayne Chan, Engineer, Eastern Region

February 27, 2015

RE: CPF-1-2014-5005 - Unit 3241 Greensburg Area, PA System Inspection

Dear Mr. Coy and Mr. Chan,

After further discussion between Mr. Kravatz and Mr. Chan regarding the details related to CPF-1-2014-5005, Sunoco Pipeline L.P. (SPLP) is submitting additional information consisting of e-mails and letters related to a hardship encountered with respect to easement acquisition for the ground bed system. Enclosures which have been located to date follow this cover page.

As noted in a previous submittal dated 10/31/2014, SPLP did attempt various CP measures to address the CP deficiency. At the same time, SPLP worked with PennDOT and Allegheny Township officials to obtain necessary rights and permits to install the ground bed system. Once installed, the ground bed improved the cathodic protection. SPLP contends a hardship was encountered with respect to timing involved with obtaining easement to install the ground bed.

Easement Correspondence Time Line

- 9/9/2010 - Field Work to evaluate possible ground bed location.
- 2/11/2011 - Best location for ground bed determined.
- 3/11/2011 - Letter to PennDOT requesting permission to install ground bed.
- 7/20/2011 - Letter to Allegheny Township requesting permission to install ground bed.
- 7/29/2011 - Proposal accepted by Allegheny Township Supervisors.
- 11/10/2011 - Necessary drawings prepared to submit with request for easement.
- 12/1/2011 - Letter to Allegheny Township with Easement agreement.
- 7/24/2012 - Follow up letter to Allegheny Township with Easement Agreement.
- 8/31/2012 - Ground Bed Easement Executed and on file in Blair County, PA.

SPLP requests that PHMSA consider these facts and easement acquisition timing as a hardship in the decision related to CPF-1-2014-5005 and, accordingly, renews its request that the NOPV and associated penalty be withdrawn.

Respectfully submitted,

David Chalson
Senior Vice President, Operations
Sunoco Pipeline L.P.

Cc: Kevin Dunleavy, Chief Counsel, Sunoco, Inc.
Albert Kravatz, Sr. Specialist, DOT Compliance