



MIPC
920 Cherry Tree Road
Aston, PA 19014

Via Overnight FedEx Delivery

October 29, 2015

RECEIVED OCT 30 2015

CN

Mr. Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

**RE: Notice of Probable Violation,
Proposed Civil Penalty and Proposed Compliance Order
Reference No. CPF 1-2015-5017**

Dear Mr. Coy,

This letter is in response to the above-referenced Notice of Probable Violation, Proposed Civil Penalty and Compliance Order dated September 29, 2015 ("Notice") issued by the DOT Pipeline and Hazardous Materials Safety Administration and received by MIPC, LLC ("MIPC") on September 30, 2015.

Please be advised that MIPC is electing to contest Item 1.a. alleged in the Notice, but is not requesting an oral hearing. However, MIPC elects to not contest violation Items 1.b., 2 and 3 alleged in the Notice. Further, MIPC will not contest the Proposed Compliance Order and will submit the updated procedures.

With regard to Item 1.a., MIPC submits the explanation below and enclosed pressure trend to show that actions were taken in compliance with the regulations for Line 408 and, with respect, we believe that this explanation will warrant a reduction of the civil penalties.

PHMSA Item 1 – 195.452 (h)(4)(i) Immediate repair conditions

MIPC failed to temporarily reduce operating pressure or shut down the pipeline until the operator completed the repair of immediate repair conditions within an HCA or could-affect an HCA.

MIPC Response

- a. Line 408 – MIPC elects to contest this finding.
 - The pipeline was idle due to scheduled downtime when the immediate repair condition was discovered on 8/27/2013. The pipeline was repaired 2 days later on 8/29/13, without requiring a pressure reduction. The pipeline was restarted, as planned, on 8/30/13. Please refer to the enclosed pressure trend.
- b. Line 208/308 – MIPC is not contesting this finding.
 - Two immediate repair conditions discovered. One was repaired in 7 days and the other in 9 days and no pressure reduction was taken.

PHMSA Item 2 – 195.425 (h)(2) Discovery of condition

MIPC failed to promptly obtain sufficient information to make the determination that a condition presents a threat to the integrity of the pipeline within an HCA or could-affect an HCA.

MIPC Response

- a. Line 408 – MIPC is not contesting this finding.
 - From date of tool run to discovery date was 267 days, exceeding the maximum requirement of 180 days.
- b. Line 203/308 – MIPC is not contesting this finding.
 - From date of tool run to discovery date was 307 days, exceeding the maximum requirement of 180 days.

PHMSA Item 3 – 195.432 Inspection of in-service breakout tanks.

MIPC failed to inspect each in-service breakout tanks at intervals not exceeding 15 months.

MIPC Response

- a. All 12 tanks inspections conducted in 2013 exceeded the 15 month inspection interval – MIPC is not contesting this finding.

If you have any questions or comments regarding this letter please contact me at (610)494-4021.

Sincerely,



Pete Pirog
MIPC Pipeline VP & General Manager

Enclosure – Line 408 Pressure Trend

Philadelphia Junction
August 26 - 30 / 24 hr Trend



Monroe Energy Historical Data - 24hrs

Insert Tagname in row 20 to populate chart and data table using (Add-Ins, Historical, Insert, Tag Name, Choose Tag).

Phila Junction Line Pressure 24 Hr Trend



Tagname

MAIN_IP_LPSI_TO_GST_F_CV

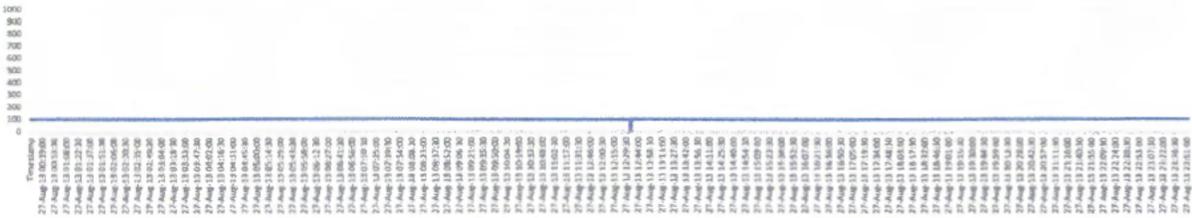
Start Time: 8/26/2013 6:00
End Time: 8/27/2013 23:59



Monroe Energy Historical Data - 24hrs

Insert Tagname in row 20 to populate chart and data table using (Add-Ins, Historical, Insert, Tag Name, Choose Tag).

Phila Junction Line Pressure 24 Hr Trend



Tagname

MAIN_IP_LPSI_TO_GST_F_CV

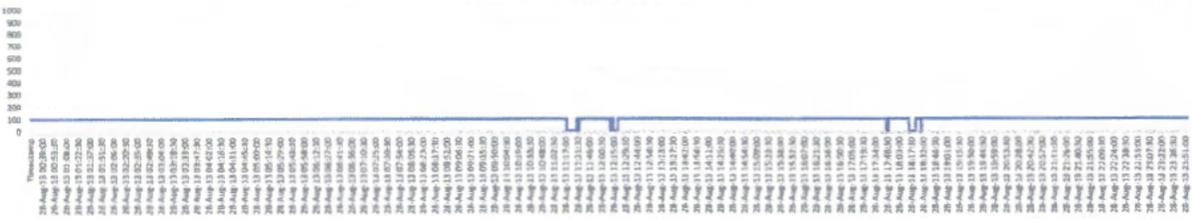
Start Time: 8/27/2013 6:00
End Time: 8/27/2013 23:59



Monroe Energy Historical Data - 24hrs

Insert Tagname in row 20 to populate chart and data table using (Add-Ins, Historical, Insert, Tag Name, Choose Tag).

Phila Junction Line Pressure 24 Hr Trend



Tagname

MAIN_IP_LPSI_TO_GST_F_CV

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End Time: 8/28/2013 23:59

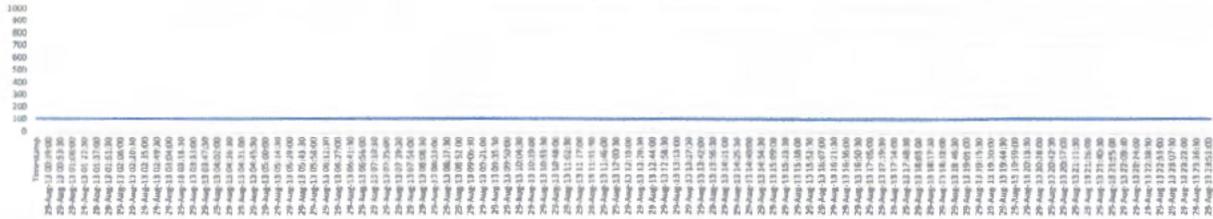
Philadelphia Junction
August 26 - 30 / 24 hr Trend



Monroe Energy Historical Data - 24hrs

Insert Tagname in row 20 to populate chart and data table using (Add-Ins, Historical, Insert, Tag Name, Choose Tag).

Phila Junction Line Pressure 24 Hr Trend



Tagname

MAIN_IP_LPS_TO_GST_F_CV

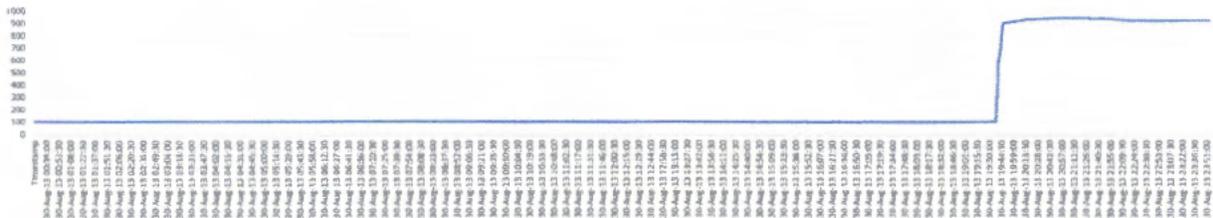
Start Time:	8/26/2013 0:00
End Time:	8/29/2013 23:59



Monroe Energy Historical Data - 24hrs

Insert Tagname in row 20 to populate chart and data table using (Add-Ins, Historical, Insert, Tag Name, Choose Tag).

Phila Junction Line Pressure 24 Hr Trend



Tagname

MAIN_IP_LPS_TO_GST_F_CV

Start Time:	8/30/2013 0:00
End Time:	8/30/2013 23:59