U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

August 11, 2020

Mr. Michael J. Hennigan
Chairman, President and Chief Executive Officer
MPLX GP LLC
539 South Main Street
Findlay, Ohio 45840

CPF 1-2020-006-NOA

Dear Mr. Hennigan:

From May 13, 2020 to May 15, 2020, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected MarkWest Bluestone Ethane Pipeline LLC's (MarkWest) procedures.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within MarkWest's plans or procedures, as described below:

1. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1) ...

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

MarkWest's procedures were inadequate. Specifically, MarkWest's *Operations, Maintenance, and Emergencies Manual*, Section 37, dated 1/5/17 (Valve Inspection Procedure) failed to include details on how each valve is protected from unauthorized operation and vandalism in accordance with § 195.420(c)[a].

During the inspection, the PHMSA inspector requested MarkWest's procedures regarding valve operation and maintenance. MarkWest provided its Valve Inspection Procedure, which discusses valve operation and maintenance in Section 37, Valve Inspection and Testing. The Valve Inspection Procedure stated in part, "Valve sites shall be maintained in a secure fashion and shall be secured…Use chain-and-padlock security measures to protect valves, electrical feeds, and DCS system components from tampering or damage on main line block valve stations and river crossing valves, and station inlet and outlet facility valves." However, the written procedure did not provide guidance on what protection is required for each valve, or state specifically how valve sites are to be secured to prevent vandalism. The procedure was not clear on when the chain-and-padlock security measures are employed as well as where they are to be located, such as on the valve site fence gate or on the valve stem, to prevent unauthorized operation and vandalism.

When the PHMSA inspector requested if there were additional procedures or guidance related to valve protection from unauthorized operation and vandalism, MarkWest stated there was no further guidance and that the current procedure could use some revision.

Therefore, MarkWest failed to include details in its procedures of how each valve is protected from unauthorized operation and vandalism in accordance with § 195.420(c). MarkWest must revise its Valve Inspection Procedure to clarify its requirements for protecting its valves from unauthorized operation and vandalism.

2. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) …

(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1) …

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

MarkWest's procedures were inadequate. Specifically, MarkWest's *Operations, Maintenance, and Emergencies Manual*, Section 8, dated 4/17/20 (Corrosion Control Procedures) failed to include details of how MarkWest inspects and evaluates pipe exposed to the atmosphere for atmospheric corrosion in accordance with § 195.583[b].

During the inspection, the PHMSA inspector requested MarkWest's procedures regarding atmospheric corrosion inspections. MarkWest provided its Corrosion Control Procedures, which discusses atmospheric corrosion control in Subsections 8.34 and 8.35. However, the written procedures did not provide any guidance on how the atmospheric corrosion control inspection is conducted and what criteria is applied when evaluating pipe and coating or jacketing condition.

When the PHMSA inspector requested if there were additional procedures or guidance related to the evaluation method used for atmospheric corrosion, MarkWest stated there was no further guidance.

Therefore, MarkWest failed to include details in its procedures of its process to inspect and evaluate atmospheric corrosion on its pipelines in accordance with § 195.583, as required by § 195.402(c)(3). MarkWest must revise its Corrosion Control Procedures to include details for performing atmospheric corrosion inspections and evaluating atmospheric corrosion on its pipelines.

3. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1) ...

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

MarkWest's procedures were inadequate. Specifically, MarkWest's *Operations, Maintenance, and Emergencies Manual*, dated 9/19/19 (Procedures) failed to include adequate details regarding maintaining maps and records of its pipeline system in accordance with § 195.404(a)(1)[c].

During the inspection, the PHMSA inspector requested MarkWest's procedures regarding operation and maintenance maps and records. MarkWest provided its Procedures, which discusses operation and maintenance records in Section ii - Introduction. The Procedures stated, "The manual, records, and maps will be kept on file, for the prescribed periods of time, on the MarkWest Company Intranet..." However, the written procedure did not include a detailed process for maintaining current maps and records of its pipeline systems in accordance with § 195.404(a)(1). The Procedures did not provide guidance on what information must be contained in maps or records, nor define where that information would be recorded. For example, the Procedures failed to direct personnel to include breakout tanks, pump stations, and pipeline valves on its maps or records.

When the PHMSA inspector requested if there were additional procedures or guidance related to how MarkWest maintains maps and records in accordance with § 195.404(a)(1), MarkWest stated there was no further guidance and that the current procedure could use some revision.

Therefore, MarkWest failed to include adequate details regarding maintaining maps and records of its pipeline system in accordance with § 195.404(a)(1). MarkWest must revise its Procedures to address this deficiency.

4. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(c) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1) ...

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

MarkWest's procedures were inadequate. Specifically, MarkWest's *Operations, Maintenance, and Emergencies Manual*, Section 8, dated 4/17/20 (Corrosion Control Procedures) failed to provide adequate details on how to remediate corrosion control deficiencies in accordance with § 195.573(e)[d].

During the inspection, the PHMSA inspector requested MarkWest's procedures regarding correcting corrosion control deficiencies. MarkWest provided its Corrosion Control Procedures, which discussed remedial actions for corrosion control deficiencies in Subsection 8.2 Definitions and Subsection 8.28 External Corrosion Inspections. Subsection 8.2 stated in part, "Damages Found-any damage to Rectifiers, Test Stations, Cad Welds, etc., shall be repaired as soon as practicable and documented on Form 118- Remedial Action Plan and/or a work order…" However, the written procedure did not provide adequate details to remediate corrosion control deficiencies within a required timeframe. For example, the procedure failed to address methods and timeframes for correcting inadequate pipe-to-soil cathodic protection potential readings, instead stating in Subsection 8.28 that "…corrective steps shall be taken".

When the PHMSA inspector requested if there were additional procedures or guidance, MarkWest stated there was no further guidance.

Therefore, MarkWest failed to include adequate details regarding correction of corrosion control deficiencies in accordance with § 195.573(e). MarkWest must revise its Corrosion Control Procedures to address methods and timeframes for correcting corrosion control deficiencies.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Enforcement Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of

receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that MarkWest Bluestone Ethane Pipeline, LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2020-006-NOA** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on USB flash drive accompanied by the original paper copy to the Eastern Region Office.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

CC: Mr. Gregory Floerk, Executive Vice President Gathering & Processing, MarkWest Bluestone Ethane Pipeline, LLC

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*

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[a] Section 195.420(c) - Each operator shall provide protection for each valve from unauthorized operation and from vandalism.

[b] Section 195.583 - What must I do to monitor atmospheric corrosion control?

(a) You must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

If the pipeline is located:	Then the frequency of inspection is:
Onshore	At least once every 3 calendar years, but with intervals not exceeding 39 months
Offshore	At least once each calendar year, but with intervals not exceeding 15 months

(b) During inspections you must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.

(c) If you find atmospheric corrosion during an inspection, you must provide protection against the corrosion as

required by § 195.581.

[c] Section 195.404(a) - Each operator shall maintain current maps and records of its pipeline systems that include at least the following information;

(1) Location and identification of the following pipeline facilities;
  (i) Breakout tanks;
  (ii) Pump stations;
  (iii) Scraper and sphere facilities;
  (iv) Pipeline valves;
  (v) Facilities to which §195.402(c)(9) applies;
  (vi) Rights-of-way; and
  (vii) Safety devices to which §195.428 applies.

[d] Section 195.573(e) *Corrective action.* You must correct any identified deficiency in corrosion control as required by §195.401(b). However, if the deficiency involves a pipeline in an integrity management program under §195.452, you must correct the deficiency as required by §195.452(h).