

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

February 28, 2017

Mr. Craig Pierson  
President  
Marathon Pipe Line, LLC  
539 South Main Street, Room 702-M  
Findlay, OH 45840

**CPF 2-2014-5003**

Dear Mr. Pierson:

On April 3, 2015, the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS) sent Marathon Pipe Line, LLC (Marathon) a Final Order with a Civil Penalty and Compliance Order (CO) regarding the assessment of four (4) cased pipe segments (segment).

On April 16, 2015, Marathon paid the Civil Penalty. On April 23, 2015, Marathon responded by electronic mail that it would not use External Corrosion Direct Assessment (ECDA) to re-assess the cased pipe segments, and intended to modify its ECDA cased pipe procedures. Marathon subsequently submitted revised procedures and plans to assess the segments using "other technology." In its work to assess the segments, Marathon was granted extensions for the initial application of "other technology," and later successful use of in-line inspection tools to assess the segments. On December 2, 2015, Marathon responded by electronic mail that it had assessed three (3) of the four (4) segments, and submitted written documentation of the assessments on May 10, 2016. On June 21, 2016, Marathon responded by written communication that it had assessed the fourth segment, and submitted written documentation of the assessment on September 19, 2016.

Based on our review of the actions taken by Marathon and the supporting documentation we have determined that Marathon has complied with the terms of the CO and Final Order. This case is now closed and no further action is necessary with respect to the matters involved in this case.

Please refer to **CPF 2-2014-5003** in any correspondence referring to this matter. If you have any questions on any other pipeline safety issue, please contact my office at (404) 832-1147.

Sincerely,

James A. Urisko  
Director, Office of Pipeline Safety  
PHMSA Southern Region