

August 23, 2013

Via Certified Mail Return Receipt Requested

Ms. Linda Daugherty, Director
Central Region, Pipeline Hazardous Materials and Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106

Re: CPF 3-2013-5021M, Notice of Amendment Response

Dear Ms. Daugherty,

On July 26, 2013, Magellan Pipeline Company, L.P. ("Magellan") received a Notice of Amendment in regards to CPF 3-2013-5021M. In response, Magellan hereby submits the requested documentation for Items 1- 4 as defined in the Notice.

Please see the attached response and documentation verifying completion of the Notice of Amendment:

ITEM #1 195.440; Public Awareness

(b) The operators' program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Magellan's procedures are inadequate because they only assess the unique attributes and characteristics of Magellan's pipelines and facilities for the Longhorn pipeline and for ammonia. The remaining attributes and characteristics of its system are not included in its program.

MAGELLAN RESPONSE:

The Public Awareness Program includes procedure 10.01-ADM-001 Message Content Guidelines that documents the specific information to be provided in the annual mailings. The requirement to include the attributes and characteristics is applicable to all pipelines and facilities in the Magellan system. Each of the annual mailing brochures includes a Hazardous Material Quick Guide detailing product characteristics and a coverage map that distinguishes the pipelines and facilities by product type. See Attachment A for a copy of the Message Content Guidelines and an annual mailings brochure.

ITEM #2 195.440; Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its

program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Magellan's procedures are inadequate because they do not sufficiently define how the various audiences are identified. For example, it is unclear how local public officials were identified. The PAP also does not require that schools be specially targeted; although Magellan does have packets available for children education and science projects

MAGELLAN RESPONSE:

The Magellan procedure for Stakeholder Audience Determination Consideration, 10.01-ADM-005, establishes the process for determining how the various stakeholder audiences are identified. Schools are specifically targeted under Affected Public in Section 2.1.1.1.8. Schools can also be targeted for supplemental outreach activities and are considered in Relevant Factors Assessment, 10.01-ADM-004, Section 2.1.2.14. See Attachment B for applicable procedures.

Magellan's procedures are inadequate because its process for reviewing Paradigm mailings for completeness and for recording baseline frequency distribution by audiences is not sufficiently detailed. The process should insure that Paradigm's mailing data matches mailings that are sent out to different audiences.

MAGELLAN RESPONSE:

The Annual Mailings Procedure, 10.01-ADM-003, has been modified to address the review for completeness. Reference Attachment B for the revised procedure, Section 2.1.6.1 through 2.1.6.3.

Magellan's procedures are inadequate because they do not include a process for reviewing supplemental activities along each section of pipeline by stakeholder. The process should encompass tracking, planning, managing, and sharing lessons learned during the annual reviews and effectiveness evaluations throughout the company.

MAGELLAN RESPONSE:

The Annual Self Assessment, 10.01-ADM-002, has been revised to include a process for identifying and implementing supplemental program enhancements by stakeholder. In addition, the Effectiveness Evaluation, 10.01-ADM-008, has been modified to encompass the tracking, planning, managing and sharing the response and feedback process. See Attachment B for applicable procedures

Magellan's procedures are inadequate because they do not include a process for evaluating and tracking the implementation of changes identified during the annual program reviews.

MAGELLAN RESPONSE:

The procedure for Effectiveness Evaluation, 10.01-ADM-008, has been modified to incorporate a process for evaluating and tracking changes identified during the annual self assessment.

Magellan's procedures are inadequate because they do not require that the program's outreach be tracked by stakeholder audience in accordance with API 1162 RP section 8.4.1. In addition, the process for measuring the program's outreach, the percentage of stakeholders reached, the understandability of message content, and the desired stakeholder behavior does not include a target level for the various measures.

MAGELLAN RESPONSE:

The procedure for Effectiveness Evaluation, 10.01-ADM-008, has been modified to include tracking by stakeholder. In addition Section 4.0 has been added to detail a standard for assessing program effectiveness that includes a process for measuring the programs outreach that includes a target level for the various measures.

ITEM #3 195.440; Public Awareness

(d) The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:

(2) Possible hazards associated with unintended releases from hazardous liquid or carbon dioxide pipeline facility.

Magellan's procedures are inadequate because its mailing information does not include specific pipeline product hazard information i.e. hazards for anhydrous ammonia.

MAGELLAN RESPONSE:

Magellan has revised its mailing information to include a map listing the pipeline product and size and also a list of products and the associated hazards. See Attachment A.

ITEM #4 195.440; Public Awareness

(g) The program must be conducted in English and in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area.

Magellan's procedures are inadequate because, even though all its audience brochures are in both English and Spanish, the process for determining whether additional languages should be utilized with a given target is not documented.

MAGELLAN RESPONSE:

The procedure for Approved Media and Delivery Methods, 10.01-ADM-007, Section 2.1.1.1, has been revised to include a process for determining when printing brochures in additional languages is necessary. See Attachment C.

If you have any questions or need additional information, please contact me by phone at (918) 574-7332 or e-mail at jason.smith@magellanlp.com to discuss.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Smith". The signature is written in a cursive style with a large initial "J".

Jason Smith
Director, Asset Integrity

Cc: Michael Pearson, Vice President, Technical Services, Magellan