



MPLX LP

1515 Arapahoe Street, Tower 1, Suite 1600
Denver, CO 80202

June 13, 2023

Via E-mail (robert.burrough@dot.gov) and UPS

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

CPF 1-2023-031-NOA

Dear Mr. Burrough:

In response to PHMSA's NOA correspondence dated April 13, 2023, MPLX responds to PHMSA's alleged inadequacies within MPLX's plans or procedures.¹

PHMSA alleged four separate deficiencies in MPLX's *Operations, Maintenance & Emergency Manual-Liquids Program, dated 06/07/21* (OME). MPLX summarizes PHMSA's allegation and MPLX's response below:

1. *MPLX's procedures failed to include a process for verifying that its supervisors maintain a thorough knowledge of that portion of the corrosion control procedures established under § 195.402(c)(3) for which they are responsible for ensuring compliance, in accordance with § 195.555. MPLX must revise its procedures to address this requirement.*

MPLX agrees to update its OME. Please see **Attachment 1**. This will require CP Supervisors to be part of updating and reviewing the CP procedures and to demonstrate their knowledge of those procedures.

2. *MPLX's procedures failed to include processes for taking necessary action, such as an emergency shutdown or pressure reduction, to minimize the volume released from any section of a pipeline system in the event of a failure, in accordance with § 195.402(e)(4). MPLX must revise its procedures to address this requirement.*

MPLX disagrees with PHMSA's position. The Liquid OME Section 7.17.4 states, "If necessary, shut down or reduce pressure to minimize hazards to protect life, environment, and property." Please see **Attachment 2**, highlighting the processes MPLX has in place for meeting this regulatory requirement. The specific examples of when to protect life, environment, and

¹ PHMSA extended the deadline for MPLX to respond to the NOA until June 13, 2023, in a letter dated May 26, 2023.

property are noted in the following areas:

3.5.1 Safety-Related Conditions. “Any Safety-Related Condition that could lead to an imminent hazard and causes (either directly or indirectly by remedial action of MPLX), for purposes other than abandonment, a 20 percent or more reduction in operating pressure or shutdown of pipeline operation.”

7.16.1 Pipeline AOCs list multiple situations when MPLX reduces pressure or shuts down pipelines.

This substantially complies with the regulatory requirements for this section and MPLX does not believe any update is necessary.

3. *MPLX failed to include instructions in its written procedures for personnel to recognize conditions that potentially may be safety-related conditions in accordance with § 195.402(f). MPLX must revise its procedures to address this requirement.*

MPLX disagrees with PHMSA’s position. Each year during the MPLX OME Review, AOCs and SRCs are reviewed by MPLX Compliance and Operations. Section 7.16.1 of MPLX’s OME outlines all AOCs, potential SRCs, and the specific form used to document SRCs (FRM-101). When AOCs in Table 7.16.1 occur, a MAPLine and/or Stop Help Start call will be initiated. These processes bring all necessary parties on a call to discuss the identified AOC/SRC issues. Please see **Attachment 3**, which highlights what conditions may constitute a Safety Related Condition. MPLX has substantially complied with the regulatory requirements here. Notwithstanding the foregoing and without waiving any rights, MPLX will change the header of Section 7.16.1 to state: “Pipeline AOCs & SRCs.”

4. *MPLX’s procedures failed to require and include a process to verify that supervisors are knowledgeable of emergency response procedures for which they are responsible in accordance with § 195.403(c). MPLX must revise its procedures to address this requirement.*

MPLX to update Section 7.18.1 of its OEM Procedures. Please see **Attachment 4**, appended to this letter.

MPLX hopes that this response satisfies PHMSA’s concerns regarding its OME procedures. However, should PHMSA continue to believe MPLX’s OME to be deficient in any way, MPLX would hereby request a hearing to adjudicate any remaining issues. Please don’t hesitate to contact me at (303) 531-9529 or TMinutillo@MPLX.com.

Sincerely,

Tony Minutillo

Tony Minutillo
MPLX LP
Compliance Manager

Enclosure(s)