



September 26, 2024

**Via Electronic Mail to:** [Gregory.Ochs@dot.gov](mailto:Gregory.Ochs@dot.gov)

Mr. Gregory A. Ochs, Director  
Central Region, Pipeline and Hazardous Materials Safety Administration  
901 Locust Street, Ste. 480  
Kansas City, MO 64106

RE: CPF 3-2024-050-NOPV

Dear Mr. Ochs,

Magellan Pipeline Company, L.P. (Magellan), a subsidiary of ONEOK, Inc., is in receipt of the above-mentioned Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order dated August 28, 2024. Magellan does not contest Items 1 or 3, or the proposed penalties. Regarding Item 2, Magellan does not contest the alleged violation as it pertains to enhancements that can be made to the process for documenting or recording the risk factors considered in its annual reviews of covered pipeline segments in HCAs. Magellan does wish to clarify for the record that the review and analysis of applicable risk factors are considered in the annual review and this process was demonstrated during the inspection.

Magellan will submit timely payment of the proposed penalty and provide its amended procedures and a record of execution for the most recent covered segment review within 90 days of receipt of the Final Order.

Magellan respects PHMSA's mission of pipeline safety. Magellan shares that same mission and appreciates the opportunity to work with PHMSA and continue to improve.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles L. Misak".

Charles L. Misak  
Director, Integrated Operations Services

Cc: Jason Smith, Vice President Asset Integrity  
Mark Materna, Vice President Refined Products and Crude Oil Operations  
[DOTCompliance@oneok.com](mailto:DOTCompliance@oneok.com), File

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