

VIA E-MAIL TO MR. SHAWN LYON

October 6, 2021

Mr. Shawn Lyon
President
Marathon Pipe Line
539 S. Main Street
Findlay, OH 45840

**CPF 5-2021-041-NOA
Closure Letter**

Dear Mr. Lyon:

From June 22 to June 23, 2021, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Marathon Pipe Line's procedures for *Class Location and HCA Identification for Marathon Pipe Line Gas Transmission Pipeline Process* (MPL-DOT-00671-PRS) in Los Angeles, California. As a result of the inspection, Marathon was issued a Notice of Amendment (Notice) on August 26, 2021 that proposed revision of the above-referenced procedure to include the requirement that all newly-identified HCAs be incorporated into its baseline assessment plan within 1 year from the date of identification pursuant to 49 C.F.R. § 192.905(c)(2).

Marathon responded to the Notice by letter dated September 23, 2021 (Response). The company contested the allegation that its procedure was inadequate to assure safe operation of a pipeline facility and requested a hearing. In its Response, Marathon provided a different procedure containing the § 192.905(c)(2) requirement.

PHMSA has reviewed this procedure – *Marathon Pipe Line Natural Gas Integrity Management Plan Governing Standard* (MPL-DOT-01432-POL) and agrees that it does contain the 1-year requirement set forth in § 192.905(c)(2). Thank you for providing this procedure. During future inspections, please provide all procedures relevant to determining compliance. § 190.203.

In closing, Marathon may wish to consider shortening its Comprehensive Verification Survey interval in Section 2.4 of its *Class Location and HCA Identification for Marathon Pipe Line Gas Transmission Pipeline Process* (MPL-DOT-00671-PRS) procedure. Although the company utilizes continuous monitoring per Section 2.2, the field verification survey to validate all existing HCA/MCA and class location boundaries is conducted at a minimum of once every fifth calendar year. In Advisory Bulletin ADB 2016-07, PHMSA noted that “if operators review class location and PIR data on an annual basis as a part of their IM programs, the accuracy of HCA determinations will be greatly improved.” Timely identifying HCAs is important in mitigating

the consequences of pipeline failures and reducing the risk of harm to the public, property, and/or environment.

This case is now closed. Thank you for your cooperation.

Sincerely,

Dustin Hubbard
Director, Western Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 J. Gilliam, J. Luo (#21-199494)