

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 16, 2000

Mr. D. P. Bozell
Vice President of Operations
Marathon Ashland Pipe Line LLC
539 South Main Street
Finlay, Ohio 45840

CPF No: 420005001C

Dear Mr. Bozell:

On November 29-December 2, 1999, a representative of the Southwest Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code conducted pipeline safety inspections of Marathon Pipe Line Company's onshore facilities and records in the Garyville, Louisiana area.

As a result of the inspection and in keeping with pipeline safety regulations, Title 49, Code of Federal Regulations, Parts 195 and 199, we have noted some areas of concern.

1. The records and mailing list for MAPL's Third Party Damage Program were either missing or incomplete during our inspection. For example, our review of the mail listings for Public Education and Liaison with Public Officials indicated that some residents in the East Baton Rouge area or public officials in towns along the right-of-way had not been sent 'mailout' materials. It is recommended that MAPL continue with the improvements to this very important program.
2. MAPL's internal corrosion monitoring records indicate a high corrosion rate but this indicator is not supported by ILI results. The anomalous corrosion rates, MAPL corrosion personnel report, may be caused by the incorrect location of the monitoring equipment. It is recommended that MAPL personnel perform an analysis to resolve this anomaly.

Marathon Pipe Line Company personnel assured us that Item 1 is being evaluated and that

improvements to the Third Force Damage Prevention Program will continue to be made. We are also assured that every effort will be made to resolve the anomaly discussed in Item 2.

We would like to point out that an important initiative, The Common Ground Study, sponsored by RSPA's Office of Pipeline Safety (OPS) has been completed. The purpose of the Study was to gather and assess information to determine the best of existing one-call notification system and underground facility damage prevention practices. The findings of the Study have been published in a report, "Common Ground Study of One-Call Systems and Damage Prevention Best Practices."

The Report is available on-line in OPS' home page (<http://www/ops.dot.gov>) and can be used to learn about the best practices for improvement of overall one-call system and damage prevention performance.

We acknowledge your response to the areas of concern that were brought to your attention during our inspection and hope that Marathon Pipe Line Company personnel will continue to improve on the safe operation and maintenance of the pipeline system. Please refer to CPF No. 420005001C in any correspondence/communication on this manner.

Sincerely,

R. M. Seeley
Regional Director, Southwest Region