

LETTER OF CONCERN

CERTIFIED - RETURN RECEIPT REQUESTED

June 4, 1997

Mr. D. P. Bozell
Operation Manager
Marathon Pipeline Company
Rocky Mountain District
539 South Main Street
Findlay, OH 45840

CPF No. 57505-C

Dear Mr. Bozell:

On April 12 to 15, 1997, representatives of the Western Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite safety inspection of your liquid pipeline facilities and records in Casper, Wyoming.

As a result of the inspection, it appears that Marathon Pipeline Company (Marathon) has committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 195. The probable violations are:

- 1) § 195.416 External corrosion control.
 - (a) Each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, conduct tests on each buried, in contact with the ground, or submerged pipeline facility in its pipeline system that is under cathodic protection to determine whether the protection is adequate.
 - (b) Each operator shall maintain the test leads required for cathodic protection in such a condition that electrical measurements can be obtained to ensure adequate protection.

Marathon did not conduct tests on the cathodic protection test station near the Casper Event Center during the 1996 calendar year. This test station is located in an area that is flooded and not adequately maintained.

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Under 49 United States Code, §60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to assess you a civil penalty. We advise you, however, that should you not correct the circumstances leading to the violations, we will take enforcement action when and if the continued violations come to our attention.

You will not hear from us again with regard to the noted inspection and our subsequent action. Because of the good faith that you have exhibited up to this time, we expect that you will act to bring your liquid pipeline facility, including operation and maintenance, into compliance with pipeline safety regulations.

Sincerely,

Edward J. Ondak
Director

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