



Wayne T. Lemoi
Director, Southern Region
Office of Pipeline Safety
233 Peachtree Street
Suite 600
Atlanta, GA 30303

RE: CPF 2-2011-5004M

Dear Mr. Lemoi:

Attached is the MarkWest follow-up response to your letter received on March 17, 2011 in regard to your 2010 audit of the MarkWest Energy Appalachia, LLC.

Feel free to contact me if you need additional information on this matter.

A handwritten signature in cursive script, appearing to read "Bruce Gillick". The signature is written in dark ink and is positioned above the typed name.

Sincerely,
Bruce Gillick
Director of Environmental, Health & Safety
MarkWest Energy Partners, L.P.
(303) 925-9228

RECEIVED APR 22 2011

Item 1

MarkWest's operations and maintenance procedures were inadequate because they did not include specific procedure(s) covering the periodic review of work done by MarkWest or contractor personnel to determine the effectiveness of the procedures used in maintenance and for taking corrective action if and when deficiencies were found.

MarkWest's Response

MarkWest management will conduct periodic job observations of pipeline employees while performing operations and maintenance tasks. The observer will compare the task with written procedures to determine effectiveness of procedures and for taking corrective action if and when deficiencies are found. All job observations shall be documented.

Item 2

MarkWest's Operator Qualification procedures were inadequate because MarkWest did not include provisions to allow individuals that are not OQ qualified to perform covered task, if directed, and observed by an individual that is OQ qualified. Specifically, MarkWest did not address in its procedures the unique factors that influence the span of control for each covered task, but instead applied a span of control of 7 to 1 to all covered tasks.

MarkWest's Response

MarkWest will determine the span of control on covered task on a case by case basis. Unique factors that influence span of control would take into account the covered task being performed. The case-by-case review will ensure that an OQ qualified person either performs the task or observe other persons performing the task.

Item 3

MarkWest's corrosion control procedures were inadequate because they did not explain how MarkWest would consider voltage drops (other than those across the structure-to-electrolyte boundary) in its annual cathodic protection survey pipe-to-soil readings. NACE SPO 169-2007 Section 6.2.2.1.1 requires consideration be given to these voltage drops for valid interpretation of the voltage measurement.

MarkWest's Response

MarkWest shall use 3 criteria for consideration of voltage drops:

- -850mv potential
- -850mv polarized potential
- 100mv Shift (Native versus Polarized)

Item 4

MarkWest's corrosion control procedures for alleviating interference currents related to AC current interference were inadequate because they did not specify what MarkWest considers as an acceptable level of AC current interference or the steps it would take to minimize the detrimental effects of such interference currents.

MarkWest's Response

If a pipeline impacts an HVAC corridor, AC current readings will be taken at Cathodic Protection Test Stations. Monitoring during peak load conditions will determine the peak AC influence on the pipeline. AC current will be limited below 15 volts through an iterative approach potentially utilizing point drain locations, additional impressed current rectifiers/ground beds, etc.