



2/15/2023

ATTN:
Al Zadeh
Manager - Pipeline Safety Section
Utah Department of Commerce
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In accordance with 49 C.F.R. § 192.18, MPLX (Operator ID 40149) is respectfully requesting that the Utah Department of Commerce (UTDoC) approve an alternative to the May 16, 2023, deadline in 49 C.F.R. § 192.9(g) for (1) complying with the corrosion control requirements in Subpart I under 49 C.F.R. § 192.9(e)(1)(ii) and (2) establishing the maximum allowable operating pressure (MAOP) of under 49 C.F.R. § (e)(2)(ii) of approximately 355.22 miles of onshore gas gathering lines in Utah.

As explained in more detail below, MPLX is requesting an alternative compliance deadline to account for the time needed to complete its review of the original records and acquisition of additional information and data from field surveys. MPLX notes that it acquired these historically-unregulated gas gathering lines, and the original design, construction, and installation of certain segments dates back to the 1980s. MPLX further notes that the 8-inch steel portions of the pipeline systems are subject to PHMSA's July 8, 2022, Notice of Limited Enforcement Discretion for Particular Type C Gas Gathering Lines. Under that exercise of enforcement discretion, PHMSA has advised operators that it will refrain from enforcing the corrosion control and MAOP requirements for existing 8-to-12-inch Type C lines until May 17, 2024.

Consistent with the exercise of enforcement discretion and to facilitate an orderly process for achieving compliance, MPLX is respectfully requesting that PHMSA approve an alternative compliance deadline of May 17, 2024, for (1) the corrosion control requirements in Subpart I and (2) MAOP requirements in 49 C.F.R. § (e)(2)(ii) for the approximately 355.22 miles of Type C gathering lines in Utah identified below.

I. Description of Affected Pipeline Facilities and Operating Environment

Table 1: Summary of Affected Facilities and Operating Environment

Pipeline System Name	Location (County(s), State(s))	Physical Characteristics and Operating Environment
Chapita Gathering	Uintah; Utah	10-inch, 12-inch, and 16-inch steel pipe
Clear Creek Gathering	Carbon; Utah	8-inch and 12-inch steel pipe
Middle Fork Gathering	Uintah; Utah	12-inch steel pipe
Three Rivers Gathering	Uintah, Duchesne; Utah	8-inch, 10-inch, 12-inch, and 16-inch steel pipe



UBFS Gathering	Uintah; Utah	8-inch and 12-inch steel pipe
Uintah Processing & Gathering	Uintah, Duchesne; Utah	8-inch, 10-inch, and 12-inch steel pipe
Wonsits-Redwash Gathering	Uintah, Duchesne; Utah	8-inch, 10-inch, 12-inch, 16-inch, and 20-inch steel pipe

II. Proposed Alternative Compliance Deadline and Justification

MPLX has made a good faith effort to comply with the May 16, 2023, deadline for complying with the corrosion control requirements in Subpart I and establishing the maximum allowable operating pressure. However, MPLX is requesting an extension of that compliance deadline for approximately 355.22 miles of Type C onshore gas gathering lines in Utah the following reasons.

First, MPLX did not own or operate all the onshore gas gathering lines in question at the time of original construction, as MPLX acquired the systems. Moreover, the original construction and installation dates for the pipelines from the 1980s, and the historical records available many of the pipelines are limited. MPLX is in the process of conducting field surveys to acquire additional information about the historical lines and expects to complete that process by May 17, 2024.

Second, MPLX owns and operates approximately 7,063 miles of onshore gas gathering lines in Colorado, North Dakota, New Mexico, Ohio, Oklahoma, Pennsylvania, Texas, Utah, West Virginia, and Wyoming states. MPLX is investing significant time, energy, and resources into achieving compliance with the Type C requirements in these other states, and that effort is creating unanticipated challenges in complying with the corrosion control and MAOP requirements for the 355.22 miles of Type C onshore gas gathering lines in Utah. MPLX believes these unique circumstances justify the limited extension of time sought in this request.

Table 2: Summary of Pipe Subject to Proposed 1-Year Extension of Compliance Deadline

Type C Requirement	≥8.625” to 12.75” Diam.	≥12.75” to 16” Diameter	≥16” Diameter
MAOP (49 C.F.R. §192.9(e)(2)(ii))	256.35 miles	47.03 miles (complete)	0.01 miles (complete)
		51.72 miles (pending)	0.11 miles (pending)
Corrosion Control (192.9(e)(1)(ii))	0 miles (complete)	0 miles (complete)	0 miles (complete)
	256.35 miles (pending)	98.75 miles (pending/date)	0.12 miles (pending/date)

III. Actions Taken to Date & Interim Safety Measures



MPLX has already taken the following actions to comply with the requirements in 49 C.F.R. Part 192 for Type C gathering lines.

- Prior to the November 16, 2022, deadline in 49 C.F.R. § 192.8(b), MPLX determined the beginning and endpoints of its onshore gas gathering lines (Type A, B, C, and R) and prepared records documenting those determinations that will be maintained for the life of the pipeline. MPLX will include this information in its 2022 Annual Report to PHMSA, which is due on March 15, 2023.

MPLX proposes to implement the following additional safety measures for the 355.22 miles of Type C gathering line from May 17, 2023, until May 17, 2024.

- MPLX will conduct patrols pursuant to 49 C.F.R. § 192.705 at the intervals prescribed for pipelines in Class 4 locations, *i.e.*, at intervals not exceeding 4.5 months, but at least four times each calendar year.
- MPLX will conduct leak surveys with a calibrated instrumented device pursuant to 49 C.F.R. § 192.706 at the intervals prescribed for pipelines in Class 4 locations, *i.e.*, at intervals not exceeding 4.5 months, but at least four times each calendar year

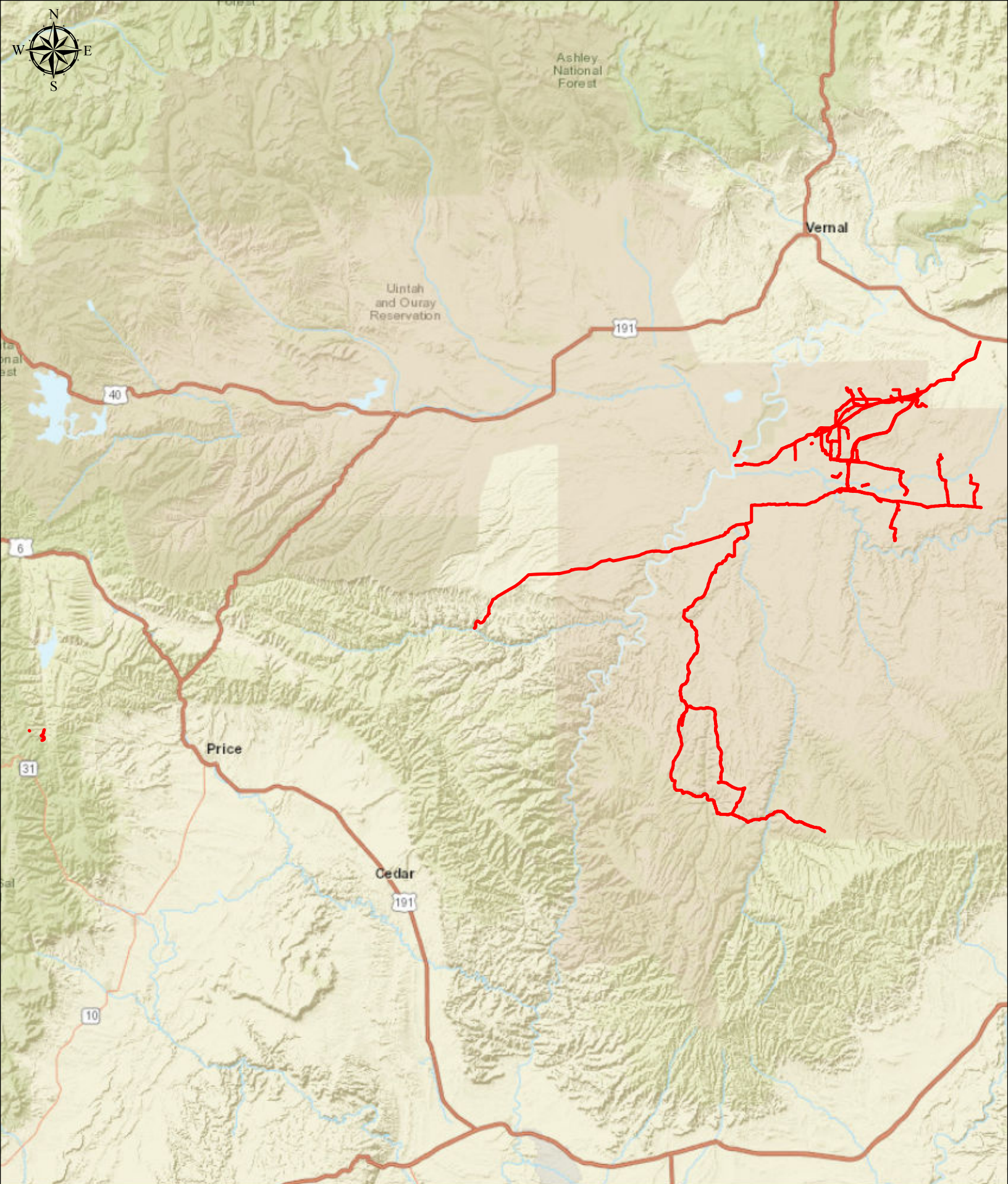
IV. Conclusion

MPLX shares PHMSA's commitment to pipeline safety and believes that the proposed alternative to the May 16, 2023, deadline in 49 C.F.R. § 192.9(g) for Type C gas gathering lines is justified for the reasons provided above. If you have any questions, please do not hesitate to contact me at (303) 531-9529 or email me at TMinutillo@MPLX.com

Regards,

Tony Minutillo
Compliance Manager

Cc: AZadeh@utah.gov Utah Department of Commerce



Legend

— Utah - Type C

Utah

