

December 17, 2009

Mr. R.M. Seeley, Director
Southwest Region, Pipeline Hazardous Materials and Safety Administration
8701 South Gessner, Suite 1110
Houston, TX 77074

Re: Longhorn Mitigation Plan, Commitment Number 12

Dear Mr. Seeley,

Magellan Midstream Partners, L.P. ("Magellan") acquired the Longhorn Partners Pipeline Assets in July 2009. In conjunction with the purchase Magellan recognizes the requirements identified in the September, 2000 Longhorn Mitigation Plan ("LMP"). Commitment Number 12 of the LMP requires ultrasonic ("UT") smart pigging of approximately 450 miles of the pipeline (from valve J-1 near Houston to Crane, Texas). Upon asset acquisition, Magellan commenced with performing UT inspections, and has to date completed 113 miles or approximately 25% of the required pipeline mileage.

Due to the continued lower than expected pipeline throughput volume, it has recently become evident that Magellan will not be able to complete UT inspection of the remaining (Warda to Crane) portion of the pipeline by January, 2010. Based upon our current forecasts for refined product pipeline shipments, Magellan seeks PHMSA's approval to extend the UT inspection timing requirement to December, 2010. As a part of this request Magellan commits to work aggressively to accelerate completion of this work pending improved product movement market conditions.

Magellan believes that there are negligible risks associated with the requested 11 month extension of the UT inspection. As stated in the LMP, UT inspection was intended to verify wall thickness and to locate laminations and other mill related anomalies. Magellan bases this belief in part upon consideration of the subject pipeline's operating history since January, 2005 (no in-service pipeline failures), cathodic protection records, predicted corrosion growth rate assessments, and product transported (petroleum refined products). Additionally, over 700 excavations with accompanying direct observations and assessments resulting primarily from two geometry, one high resolution magnetic flux, and one transverse field magnetic flux smart pig inspections since 2005 did not reveal any concerns that would be negatively impacted by the requested UT inspection extension. Further, in preparation of this request, the Operational Reliability Assessment ("ORA") contractor was consulted to consider potentials for hydrogen blistering and pressure

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cycling fatigue. The ORA contractor review did not result in the identification of high risk integrity concerns.

Please reply with your concurrence of this UT inspection extension request and/or contact me by phone at (918) 574-7326 or e-mail at doug.chabino@magellanlp.com to discuss. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Doug Chabino". The signature is written in black ink and is positioned above the printed name and title.

Doug Chabino
Manager, Asset Integrity Engineering

Cc: Terri Binns, PHMSA
Larry Davied, Magellan, Vice President, Technical Services
Deandra Chancellor, Regulatory Compliance Coordinator
Clyde Clausen, Manager, Pipeline Integrity