

June 2, 2020

Via Certified Mail Return Receipt Requested

Mr. Allan Beshore, Director
Central Region, Pipeline Hazardous Materials and Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64016

Re: Longhorn Pipeline - LMP Change

Dear Mr. Beshore,

Magellan Pipeline Company, L.P. (Magellan) desires to increase the capacity of the Longhorn Pipeline refined products system from Odessa to El Paso. This increase in capacity is in response to increased shipper demand for additional refined products pipeline capacity for the West Texas and New Mexico markets. Per the Longhorn Mitigation Plan (LMP) Commitment Item 39, "The Longhorn Mitigation Plan may be modified only after Longhorn has reviewed proposed changes with the DOT/OPS and has received from DOT/OPS written concurrence with the proposed modifications."

Magellan hereby submits the proposed change in the form of this letter to the DOT/OPS to modify the LMP description from the current 64,000 bpd to a revised 92,180 bpd on the Longhorn Pipeline refined products system from Odessa to El Paso. Magellan is also providing clarification to the System Description for the El Paso Laterals which have currently approved independent hydraulic surge system capacities that differ from the Odessa to El Paso pipeline segment. Magellan proposes replacing the refined products description in Section 2.1 - System Description of the LMP as follows:

The pipeline system covered under the Longhorn Mitigation Plan is made up of two distinct systems. The first system transports refined products from Odessa to El Paso, Texas and distributes product on four lateral pipelines. The primary refined product system with a capacity of 92,180 bpd is made up of the following two segments:

- A 29 mile, 8" pipeline from Odessa, Texas to a station in Crane County (Crane Station).
- A 237 mile, 18" pipeline from Crane Station to El Paso Terminal. Pumping units could potentially be added at an existing site called Cottonwood Station to assist with expansion of capacity.

There are four El Paso lateral pipelines, 9.4 miles, that connect El Paso Terminal to El Paso Junction (also known as the El Paso Laterals), with varying hydraulic surge system capacity.

- El Paso to Kinder Morgan, 12" – 104,400 bpd
- El Paso to Kinder Morgan, 8" – 36,000 bpd
- El Paso to Chevron, 8" – 48,000 bpd
- Kinder Morgan Flush Line, 8" – 50,400 bpd

The approved flow rate would be contingent upon PHMSA's review of the surge pressure analysis and acceptance of mitigation measures proposed per LMP Commitment Item 31. Per LMP Commitment Item 31, Magellan submits the following mitigation measures on the Odessa to El Paso pipeline Segment to

achieve the higher capacity and maintain the mitigation commitments outlined in the LMP to PHMSA for review and approval:

1. Attachment #1 Modified Surge Pressure Mitigation Summary provides a summary for the devices and locations of surge mitigation measures to be implemented.
2. Attachment #2 Operating Pressure Summary Table provides a summary of the maximum discharge pressures, maximum operating pressures, and the maximum surge pressures per pipeline segment.
3. Attachment #3 Longhorn Pipeline Process Flow Diagram illustrates the changes to the proposed surge mitigations in a PFD format.
4. Attachment #4 Surge Analysis for Odessa to El Paso provides the details regarding the surge analysis and the development of the surge mitigation recommendations.
5. An Emergency Flow Restricting Device (EFRD) will be installed near milepost 689.5 as reflected in the provided attachments.

As required in the Longhorn Mitigation Plan, the proposed change in the form of this letter has been made available to the public by posting on the Magellan website, and copies of this letter have been made available to the General Manager of the Lower Colorado River Authority (LCRA) and to the Mayors of Houston, Austin, and El Paso at the addresses show below.

If you have any questions or need additional information, please contact me by phone at (918) 574-7073 or e-mail at mark.materna@magellanlp.com at your convenience.

Sincerely,



Mark Materna
Director, Pipeline Integrity

Cc: Jason Smith, Vice President, Asset Integrity, Magellan

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