

Longhorn Mitigation Plan  
Commitment Implementation Status Report  
Annual - 2024

Mitigation Item No.	Description	Timing	Status of Commitment Implementation
38	Longhorn shall submit periodic reports to DOT/OPS that will include information about the status of mitigation commitment implementation, the character of interim developments as relate to mitigation commitments, and the results of mitigation-related studies and analyses. The reports shall also summarize developments related to its Operational Reliability Assessment ("ORA"). The reports shall be made available to the public.		This report covers the 2024 annual reporting period. This report addresses mitigation commitments that either begin with, or extend beyond startup and have not had a Completion Report submitted to PHMSA/OPS. System startup occurred January 27, 2005.
10	Longhorn shall, following the use of sizing and (where appropriate) geometry tools, perform an in-line inspection of the existing pipeline (Valve J-1 to Crane) with a transverse field magnetic flux inspection (TFI) tool and remediate any problems identified. See the LPSIP at Section 3.5.2 and the ORA at Section 4.0.	At such intervals as are established by the ORA, provided that an inspection shall be performed no more than 3 years after system startup in Tier II and III areas.	TFI runs were completed on the following segments in 2024: James River to Eckert, Eckert to Cedar Valley, Cedar Valley to Bastrop, Bastrop to Warda, Warda to Buckhorn, Buckhorn to Satsuma. No digs from TFI runs were issued or completed in 2024.
11	Longhorn shall, following the use of sizing and (where appropriate) geometry tools, perform an in-line inspection of the existing pipeline (Valve J-1 to Crane) with a high resolution magnetic flux leakage tool (MFL Tool) and remediate any problems identified. See the LPSIP at Section 3.5.2 and the ORA at Section 4.0.	Within 3 months of startup and thereafter at such intervals as are established by the Operational Reliability Assessment	No MFL tools were run in 2024. No digs based on previous MFL runs were completed in 2024.
12	Longhorn shall, following the use of sizing and (where appropriate) geometry tools, perform an in-line inspection of the existing pipeline (Valve J-1 to Crane) with an ultrasonic wall measurement tool (UT Tool) and remediate any problems identified. See the LPSIP at Section 3.5.2 and the ORA at Section 4.0.	At such intervals as are established by the ORA, provided that an inspection shall be performed no more than 5 years after system startup.	UT runs were completed on the following segments in 2024: James River to Eckert, Eckert to Cedar Valley, Cedar Valley to Bastrop, Bastrop to Warda, Warda to Buckhorn, Buckhorn to Satsuma. No digs from 2024 UT runs were issued or completed in 2024. Thirty (30) digs were completed in 2024 on the Crane to Texon segment (from a 2023 UT run).
12a	Longhorn shall perform an in-line inspection of the existing pipeline (Valve J-1 to Crane) with a "smart" geometry inspection tool and remediate any problems identified. See the LPSIP at Section 3.5.2 and the ORA at Section 4.0.	At such intervals as are established by the ORA, provided that no more than 3 years shall pass without an in-line inspection being performed using an inspection tool capable of detecting third party damage	DEF runs were completed on the following segments in 2024: James River to Eckert, Eckert to Cedar Valley, Cedar Valley to Bastrop, Bastrop to Warda, Warda to Buckhorn, Buckhorn to Satsuma. No digs from the 2024 DEF runs were completed in 2024. The following segments had digs performed based on 2023 DEF runs: Barnhart to Cartman (4 digs), Kimble County to James River (2 digs).
19	Longhorn has performed studies evaluating each of the following matters along the pipeline, and shall implement the recommendations of such studies. See Mitigation Item 19.		
19b	Scour, erosion and flood potential.	Periodically after startup. (Scheduled inspections occur at various water crossings at 6 month and 5 year intervals. Inspections also occur after certain flood events).	Waterway inspections were completed on the following waterways in 2024 (Mileposts shown) -- Crane to Odessa 8": Monohan's Draw (28.83). Crane to East Houston: Greens Bayou (9.93), Rabbs Creek (112.26), Threadgill Creek (250), Llano River (276.54)
19d	Ground movement, subsidence and aseismic faulting	Periodically after startup. (The study recommended surveys to be performed every 6 months).	Monitoring was completed in June and December of 2024.
19e	Landslide potential.	Periodically after startup. (The study recommended surveys to be performed every 5 years).	A photogrammetry survey was conducted in November of 2020. A study is being scheduled for 2025.

Longhorn Mitigation Plan  
Commitment Implementation Status Report  
Annual - 2024

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25	Longhorn shall develop enhanced public education/damage prevention programs to, inter alia (a) ensure awareness among contractors and potentially affected public, (b) promote cooperation in protecting the pipeline and (c) to provide information to potentially affected communities with regard to detection of and responses to well water contamination. See the LPSIP Section 3.5.4 See Mitigation Appendix, Item 25.	Continuously after startup.	Public awareness program was implemented as required by the LMP. Annual mail out was conducted for the affected public residential, general businesses and schools within 1/2 mile of the pipeline for urban areas and within 2 miles of the pipeline in rural areas, excavators and farmers within 10 miles of the pipeline and emergency officials and local public officials within the county, plus 20 miles of the pipeline. Brochures are mailed in envelopes and include a bounce back card with a chance to win \$100 gift card if completed, a magnet and a checklist for emergency responder stakeholders. Magellan participated in an outreach program with scheduled emergency responder and excavator meetings in all 25 counties. Magellan continues to operate a school outreach program which is a collaborative effort involving the Pipeline Association for Public Awareness and the Danielle Dawn Smalley Foundation. Smalley Foundation targets 34 schools within 1000' of the pipeline on a 4-year calendar. In 2024, 7 of the 34 schools had web-meetings. Magellan targeted 132 emergency responders in all 25 counties and provided maps and other information about Magellan's system regarding public safety. In 2024, Magellan targeted 15 equipment rental stores within 5 miles of the pipeline and provided a Kiosk which included pipeline safety and damage prevention information, trinkets, and magnets. Magellan's bi-annual Door-to-Door Program was implemented in 2024 and through that effort, 9,734 pipeline safety door hangers were distributed to residents adjacent to the pipeline in Tier II and Tier III areas. Magellan's annual Supplemental Public Awareness program placed several 811 banners along Magellan's ROW, met with school officials to discuss their evacuation procedure, and attended TX811 chapter meetings. Magellan also had personal contact (email, phone call, or face-to-face) with stakeholders along Magellan's ROW. Magellan is a Bronze sponsor of the Common Ground Alliance and attended several meetings. Through API Magellan and attended Damage Prevention Work Group and Public Engagement and Awareness Group Meetings.
31	Longhorn shall perform a surge pressure analysis prior to any increase in the pumping capacity above those rates for which analyses have been performed or any other change which has the capability to change the surge pressures in the system. Longhorn will be required to submit mitigation measures acceptable to DOT/OPS prior to any such change in the system, which mitigation measures will adequately address any MASP problems on the system identified by the surge pressure analysis.	Prior to any change in the system that has the capability to cause surge pressures to occur on the system	No LMC-31 or LMC-39 requests were submitted in 2024.
32	Longhorn shall perform pipe-to-soil potential surveys semi-annually over sensitive and hypersensitive areas (which is twice the frequency required by DOT regulations - 49 C.F.R. 195.416) and corrective measures will be implemented, as necessary, where indicated by the surveys. See LPSIP Section 3.5.1.	No more than six months after startup and semi-annually thereafter.	Semi-annual pipe-to-soil potential surveys for 2024 have been completed.
<b>Lower Colorado River Authority (LCRA) Settlement Agreement</b>			
6	Describe any emergency drills and results from those drills within the Pedernales basin (City of Austin, Pedernales River watershed and Bastrop County) during this reporting period.	Once every 3 years	An emergency drill was conducted on the Pedernales River in November 2024

Longhorn Mitigation Plan  
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Exhibit A 3a	Plans and specifications sealed by a professional engineer in Texas that details modifications necessary to public water systems that are regulated by TNRCC (or any successor agency) that take water from Lake Travis. Resealing should occur once every five years.	Once every 5 years	Plans and specifications were submitted to PHMSA in September 2024.
	Describe any maintenance, inspections, smart pigging, repairs, upgrades to the pipeline within the Colorado River basin (City of Austin, Pedernales River watershed and Bastrop County) during this reporting period. Colorado River Basin identified as MP 94.45 to MP 426.8 which includes ILI segments of Satsuma to Warda (last 18.5 miles), Warda to Cedar Valley, Cedar Valley to Eckert, Eckert to Ft. McKavett, and Ft. McKavett to Crane (first 102 miles)	Annually	TFI, UT and DEF tool runs were completed on the following segments in 2024: James River to Eckert, Eckert to Cedar Valley, Cedar Valley to Bastrop, Bastrop to Warda, Warda to Buckhorn. No digs from these runs were completed in 2024. Nineteen digs from 2023 runs were completed in 2024.
<b>Operational Reliability Assessment</b>			
	The ORA will provide Longhorn with an annual technical assessment of the actual effectiveness of the overall LPSIP. The ORA will provide feedback on the adequacy, frequency, and additional element criteria of the evaluation plan, which includes use of internal inspection devices, hydrotests, and other mechanical integrity assessment and confirming processes and technologies. The ORA results will be factored back into the LPSIP and will be integrated into the ongoing program.	Annually, or per event as defined in LMP	OPS approved Kiefner and Associates, Inc., as the independent, third-party ORA contractor. The 2024 Annual ORA report covering 2023 operations is to be submitted to PHMSA by the end of the first quarter 2025.
<b>Longhorn Pipeline System Integrity Plan</b>			
	The LPSIP consists of certain specific "Process Elements." The descriptions and program attributes of the Process Elements reflect action "over and above" those specified and required under various regulations and statutes, such as DOT's Title 49 C.F.R. Part 195.  Implementation of the "Process Elements" will ensure that Longhorn will effectively identify, analyze, and responsibly manage the most important threats to and risk of the Longhorn Pipeline System.	Continuously - Operations Annually - Self Audit	The 2024 LPSIP Annual Self-Audit covering 2023 operations was completed, provided to PHMSA on January 27, 2025 and made available to the public on the ONEOK website at WWW.ONEOK.COM under the "Refined Products and Crude" tab and "Longhorn Info" link. All Longhorn public information was migrated to ONEOK.com in 2024, following the merger of Magellan and ONEOK in September of 2023.
<b>Relative Risk Assessment Model</b>			
	The Relative Risk Assessment Model (Model) is designed to automatically prioritize and sort pipeline segments in accordance with their scored relative risk in relation to all other segments. Changes in the surrounding population, the environment, or mechanical attributes of the pipeline are updated in the model as new information is available and the Model is rerun.	Annually, or per event as defined in LMP	The model is updated periodically as new information becomes available. The Relative Risk Model was changed to a Probabilistic Risk Model per the approved 2012 EA. The new model was fully implemented on August 12, 2013. The model showed that risk levels met the threshold outlined in the 2012 EA. The model was rerun in 2024 based on data modifications for operations in 2023 and the risk levels continue to meet threshold.
<b>Material Documentation - Reversal EA</b>			
6	Conduct non-destructive or destructive strength tests for 50% of all annual pipe excavations associated with in-line inspection anomaly evaluations or remediation.	Continuously after startup	In 2024 fifty-five (55) excavations were associated with in-line inspection anomaly evaluations meeting the criteria for material testing per the material documentation requirement. Non-destructive positive material identification was completed on twenty-eight (28) locations (50.91%).
9 b (iv)	Run Hardspot Tool that can detect pipe hard spots: (1) Remediate indications that pipe is susceptible to hard spots (over 325 Brinell hardness) based upon known pipe information (i.e. manufacturing vintage, has had a past leak or failure due to a pipe hard spot in the pipeline) as soon as practicable but no later than one (1) year after Hardspot Tool run.	Within 1 year of startup and thereafter at such intervals as are established by the Operational Reliability Assessment	No Hardspot Tool runs were required or completed in 2024.

Longhorn Mitigation Plan  
 Commitment Implementation Status Report  
 Annual - 2024

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12	Submit procedures and perform Close Interval Surveys (CIS) on a maximum 5-year basis and remediate findings. Perform initial survey within one-year of PHMSA issuance of FONSI.	Procedures Modifications - Prior to startup  CIS within 1 year of startup and thereafter at maximum interval of 5 years	Magellan submitted to PHMSA January 16, 2013 revised procedure 7.04-ADM-001.  A CIS survey from Crane to El Paso was completed in 2024.
13	Submit procedures and perform AC Potential Interference Surveys on a maximum 5-year basis and remediate findings. Perform initial survey within one-year of PHMSA issuance of FONSI.	Procedures Modifications - Prior to startup  AC Potential Interference Survey within 1 year of startup and thereafter at maximum interval of 5 years	Magellan submitted to PHMSA January 16, 2013 revised procedure 7.04-ADM-001.  AC Potential Interference Surveys are taken during annual Pipe to Soil surveys to meet this commitment.