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Line Cutting

Overview

Purpose

The purpose of this document is to establish standardized requirements to safely perform line cutting activities on process and utility piping systems. It is intended to eliminate the potential release of hazardous energy by ensuring proper planning, identification, isolation, verification, and execution. This IG will replace the First Break requirements for line cutting and drilling in *Section 5.18* of [RSP-1128-000](#) and *Section 5.18* of [IG-86](#).

Scope

This document applies to all line cutting activities performed at Marathon Petroleum Company LP (MPC) Refining sites, including process and utility piping systems.

Out of Scope

This document excludes approved minor servicing activities, electrical systems, new piping that is being fabricated at ground level or in shops and piping systems inside vessels, towers, reactors, etc. (e.g., heater tubes, spray bars, etc.), when the equipment has been isolated and depressured.

Implementation

Sites shall perform the following by 10/1/2026:

- (a) Perform gap assessments
- (b) Train personnel
- (c) Incorporate into contractor training
- (d) Adopt Interim Guidance
- (e) Sites to retire local policies

Records Retention

Printed copies of this document should not be retained more than 12 months. Any revision to this document will be retained indefinitely.

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1.0 References

1.1 Refining References

The table below lists the Refining references used with this document.

Number	Description
RSP-1121-010	Blinding & Energy Isolation
RSP-1128-000	Safe Work Permit
RSP-1715-000	Hot Work
IG-86	Interim Guidance for Safe Work Permit
SP-00-45	Piping and Equipment Tie-In Identification

1.2 Terms

For definitions of terms used in this document, see [Appendix A: Terms and Definitions](#).

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2.0 Roles and Responsibilities

2.1 Roles and Responsibilities

The table below describes the roles and responsibilities related to this document.

Roles	Responsibilities
Owning Department	(a) Planning Phase: – Work with Responsible Party to ensure proper preparation (e.g., scaffolding for cut label placement, insulation removal). – Develop master isolation/blinding list. (b) Execution Phase: – Ensure lines are properly: ▪ Isolated ▪ De-pressured ▪ Drained ▪ Purged ▪ Cleaned (per RSP-1121-010) ▪ Tracing Electric &/or Steam deenergized and removed – Perform or coordinate atmospheric monitoring. – Assign a qualified Operator to issue all required permits. – Participate in the Joint Job Site Visit (JJSV). – Verify, sign, and install cut label with the Servicing Group during the JJSV. – Perform verification of line drilling and cut locations. – Be present for initial line drilling and cuts with servicing group individual making the cut. – Monitor job conditions throughout execution.
Servicing Group	(a) Execution Phase: – Execute the cutting activity in accordance with this procedure. – Support isolation/blinding activities as required. – Participate in the JJSV (this shall include the servicing group member performing the actual cut). – Install and sign cut label with the Owning Department. – Perform atmospheric monitoring, if required.
Responsible Party (Engineering / Project / TAR / Maintenance)	(a) Planning Phase: – Conduct a planning walk with: ▪ Operations, and ▪ Maintenance/Construction. – Identify the following: ▪ Hazards (lead, asbestos, pyrophoric, etc.), ▪ Verify Isolation requirements (master isolation/blinding list), and ▪ Operational impacts (shutdowns, road closures, sequencing). – Ensure proper preparation (e.g., scaffolding for cut label placement, insulation removal). – Develop complete work packages. – Notify Owning Department and Servicing Group when line cutting has been approved in the MOC process.

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3.0 Procedure Requirements

3.1 Key Safety Principles

Key safety principles include the following:

- (a) Thorough work planning sets the foundation for successful field execution
- (b) Correct line shall be identified and labeled before line cutting activities
- (c) Proper LO/TO and depressurization shall be confirmed before line cutting activities
- (d) No Walk – No Work, direct communication and mutual understanding between servicing member doing the work and owning department is critical to prevent errors

3.2 Work Planning Requirements

Before any cutting activity, apply the following work planning requirements:

- (a) A complete work package shall be developed and reviewed.
 - Review Piping and Equipment Tie-In Identification requirements in [SP-00-45](#).
 - Identify tie-in points and sections of piping that will be removed.
 - Identify initial cut points, including sequence of cuts to be made, piping configurations at cut locations that may trap liquid/product, and hole drill verification points.
 - Subsequent cuts should be planned in a manner to reduce the need for initial cut locations, following the guidelines of [Section 3.9\(b\)](#).
 - Consider length between cuts.
 - Line of site to previous cut location.
 - Minimum requirements included in the work package:
 - P&IDs showing cut locations
 - Isometric drawings showing cut locations (or alternative documents)
 - Sequence of line cuts
 - Line Cutting Checklist ([IG-87-FORM01](#))
- (b) Hazards, isolation strategy, and execution plan shall be agreed upon.
 - A master isolation/blinding list shall be developed.
 - If verification points are not within 20 feet for initial cuts or low point cuts, a hole shall be drilled at the cut location
- (c) A planning walk shall be conducted with Owning Department, and Responsible Party.

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3.0 Procedure Requirements, Continued

3.3 Cut Identification and Tagging Requirements

Apply the following cut identification and tagging requirements:

3.3.1 Cut Point Identification:

- (a) Each cut point shall be clearly defined, including sequencing of cuts if multiple cuts are applicable, in the work package.
- (b) A cut label shall be attached at each cut point. If cut point is insulated, insulation must be removed prior to applying cut label during the JJSV.

3.3.2 Two-Part Cut Label System: The cut label system is required to ensure positive identification and accountability:

(a) JJSV Section:

- Apply and sign during the JJSV after all parties verify the following:
 - Name of Servicing Group Performing the Cut
 - Correct line
 - Correct cut/drill point
 - Job ID #
 - Permit #
 - Cut Sequence #
 - Date
- Serves as documentation of agreement of the cut/drill point location.
- (b) Signature of operator and JJSV servicing group individual making the cut shall sign and date during the JJSV.
- (c) **Approval to Cut Section:** Includes the following:
 - Checkbox indicating if operator is required during the cut
 - Signatures of operator and servicing group individual making the cut shall be signed at the time of the cut.

3.3.3 Tagging Controls:

- (a) Label shall be installed during the JJSV.
- (b) Label shall be installed so that the “Cut Here” is positioned at the desired cut location.
- (c) Label shall be legible, durable, and securely attached to the pipe being cut.

Section A *Attach and Signed at Time of JJSV*

Owing Department Rep. Print Name: _____

Owing Department Rep. Signature: _____

Serv. Group Individual Making the Cut - JJSV Print Name: _____

Serv. Group Individual Making the Cut - JJSV Signature: _____

Servicing Group Company: _____

Permit #: _____ Date: _____

Job ID #: _____ Cut Seq. #: _____

Label # **B00001** beAed BN# 474-0390-07

Section B *Signed at Time of Cut*

Owing Department Representative Shall be Present for Initial Cut

☐ If Initiated Owing Department Rep. has verified this is a subsequent cut and does not need to be present for this cut, Owing Department Rep. will sign during JJSV.

Owing Department Rep. Signature: _____

Servicing Group Individual Making Cut Signature: _____

Cut shall be completed during the Servicing Group Individual's work shift who signed during the JJSV. If not, a new JJSV is required and a time tag shall be signed by both the Owing Department and Servicing Group.

CUT HERE

Process Flow / Place Horizontal on Pipe

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3.0 Procedure Requirements, Continued

3.4 Isolation and Verification Requirements

Apply the following isolation and verification requirements:

- (a) Isolation shall comply with [RSP-1121-010](#).
- (b) A master isolation/blinding list shall be developed.
- (c) If verification points are not within 20 feet or piping configuration at initial cuts is in a low point or pocketed:
 - A hole shall be drilled at the cut location, and
 - Atmospheric monitoring shall be conducted prior to cutting.

3.5 Permit Section

Apply the following permit requirements for line cutting

- (a) Initial line cuts shall be permitted separately, with no other work associated with the permit (i.e., insulation removal, scaffold modifications, etc.).
- (b) The cut point identification label number shall be listed in the additional location description line of the safe work permit.
- (c) Subsequent cuts can be added to the original permit or permitted separately.
 - A new JJSV shall be required for subsequent cuts added to the original permit.
 - When adding subsequent cuts to an existing permit the following information shall be added to the permit.
 - Additional cut point identification label number(s).
 - List out the sequence order of cuts to be made.
 - A permit may be extended one time, for a period of 12 hours but not exceeding 24 hours in total.
 - A permit extension will require a new JJSV and new cut point identification labels to be placed and signed.
 - Separate permits are required for different lines.

3.6 Joint Job Site Visit (JJSV) Requirements

During the JJSV, apply the following requirements:

- (d) Verify Work Package is complete and available.
- (e) Review work package.
- (f) Verify LOTO is complete (energy isolation, blinding, etc.).
- (g) Confirm the line is de-pressured, drained, purged, and clean.
- (h) Walk down the full line inside of the isolation to the cut location(s).
- (i) Verify and agree on the following:
 - Correct line identification
 - Correct cut/drill location(s)
 - Correct cut sequence
- (j) Apply the cut label(s).
- (k) Sign/date **Section A** of the cut label (indicating owning department and servicing group individual making the cut must be present, have laid hands on the line to be cut and agreed on the location).
- (l) A photo of the signed/dated Section A of the cut point isolation label shall be added to the e-permit as an attachment.
- (m) Complete work permit.

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3.0 Procedure Requirements, Continued

3.7 Line Cutting Checklist

- A *Line Cutting Checklist* ([IG-87-FORM01](#)) is required for all activities. Checklists shall
- (a) Be started during the JJSV and completed at the time of the cut.
 - (b) One checklist may be used for multiple cuts as long as the cut locations are identified on the same safe work permit, and same line.
 - (c) Remain at the job site during execution with the permit.
 - (d) Paper copies of the checklist shall be retained with the permit.
 - (e) When using an e-permit attach a photo of the completed checklist to the e-permit as an attachment before closing out the e-permit.

Reference: For the up to date, working copy of the Line Cutting Checklist, use the following link: [IG-87-FORM01.docx](#)

3.8 Initial Line Cutting Execution Requirements

- Apply the following requirements for the initial line cut:
- (a) Safe Work Permit shall be issued for initial line cut/drill.
 - (b) An Operator shall be present at the cut location.
 - (c) Immediately prior to the initial cut/drill, the Operator and the Servicing Group individual making the cut shall complete **Section B** of the *Line Cutting Checklist* ([IG-87-FORM01](#)).
 - (d) The Operator and Servicing Group representative making the cut shall both sign **Section B** of the cut label to confirm the correct line has been identified and is ready to be cut/drilled.
 - (e) The Operator may leave after the pipe wall has been breached and verified no liquid or vapor is present.

3.9 Subsequent Line Cutting Execution Requirements

- Apply the following requirements for the subsequent line cut:
- (a) Subsequent line-cut locations may be added to the initial Safe Work Permit after:
 - The initial line cut has been completed,
 - An additional JJSV has been completed, including subsequent cut tags installed, and cut sequencing has been agreed by owning department and servicing group,
 - Additional cuts added to the existing SWP shall be completed within the work shift, and
 - Servicing group representative making the cut is present for JJSV.
 - (b) Additional conditions shall be met: The cuts are performed on the same, previously verified line segment.
 - (c) There is no opportunity to access or confuse adjacent lines or systems. If any of the above conditions cannot be met the line cut shall be permitted as an initial cut and shall meet all the requirements indicated for an initial cut.
 - (d) Immediately prior to the subsequent cut/drill(s), the Servicing Group representative shall complete **Section B** of the *Line Cutting Checklist* ([IG-87-FORM01](#)).
 - (e) The Servicing Group representative completing the cut shall sign Section B of the cut label to confirm the correct line has been identified and is ready to be cut/drilled
 - (f) The Operator is not required to be present for subsequent cuts but their signature on the cut label serves as final indication that they have granted permission to make the cut/drill(s) during the JJSV indicating their approval to cut the line.
 - (g) The operator shall not sign that section if conditions are not ready to immediately begin the cut.

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Appendix A: Terms and Definitions

A.1 Cut Point	<i>Cut Point</i> refers to the exact designated location where the pipe will be cut, as identified in the work package.
A.2 Cut Label	<i>Cut Label</i> refers to a two-part label system used to positively identify and verify approved cut locations.
A.3 Initial Line Cut	<i>Initial Line Cut</i> refers to the initial drilling or cutting of a line.
A.4 Line Cutting	<i>Line Cutting</i> refers to any activity involving cutting or drilling into piping or equipment.
A.5 Subsequent Line Cut	<i>Subsequent Line Cut</i> refers to any additional drilling or cutting of a line after the initial drill or cut location.

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Revision History

Document Complete the following table for each document revision.
Revision History

Rev. No.	Description of Change	Author	Approved By	Rev. Date
0	First issue of document.	A.P. Morales	Refining VPs	7/8/26