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BRIDGER PIPELINE LLC

111 South Durbin Third Floor, P O Drawer 2360

Casper, WY 82602

December 22, 2009

Chris Hoidal, P.E., Director
Office of Pipeline Safety
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

VIA FEDERAL EXPRESS

Re: Bridger Pipeline, LLC
Notice of Probable Violation - CPF 5-2009-5034
Supplemental Statement of Issues

Dear Mr. Hoidal:

On October 29, 2009, Bridger Pipeline Company ("Bridger" or "BPL") requested an in-person hearing regarding the above-referenced Notice of Probable Violation and Proposed compliance Order (collectively, the "NPV"), and provided an initial statement of the issues we intend to raise at the hearing. Based upon investigation, location and evaluation of the relevant regulations as originally enacted forty years ago, the evolution of those regulations, and their meaning and intent, Bridger hereby supplements its statement of issues that it intends to raise at the hearing.

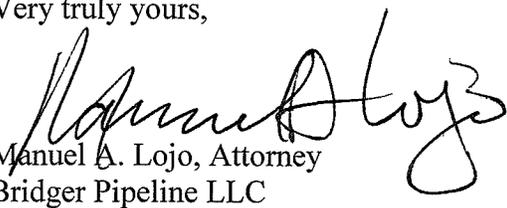
We have concluded that the pipe in the Poplar station upon which alleged violations 2 and 3 are predicated is not within the purview of the cited regulations. Note that 49 C.F.R. Section 195.1(a)(2) applies to "[t]ransportation through any pipeline, other than a gathering line, that has a maximum operating pressure (MOP) greater than 20-percent of the specified minimum yield strength." Bridger intends to demonstrate at the hearing that the referenced pipe is not a gathering line and is operated at 70 psi, which is far less than 20-percent of the specified minimum yield strength, and this station pipe is also isolated from and therefore not subject to, system pressure.

Accordingly, pipe within the Poplar Station is not subject to regulatory jurisdiction and any NPVB items and compliance orders directed at alleged acts or omissions associated with the pipe do not constitute violations.

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Please do not hesitate to contact either Mr. Harris or myself at our respective addresses.

Very truly yours,



Manuel A. Lojo, Attorney
Bridger Pipeline LLC