



March 8, 2023

Dustin Hubbard (dustin.hubbard@dot.gov)  
Director, Western Region, Office of Pipeline Safety  
Pipeline and Hazardous Materials Safety Administration  
12300 W. Dakota Avenue, Suite 110  
Lakewood, CO 80228

Re: CPF 5-2023-021-NOPV

Dear Mr. Dustin Hubbard,

This letter is in response CPF 5-2023-021-NOPV.

Calumet Montana Refining (Calumet) received two items relating to inspection CPF 5-2023-021-NOPV of which Item 2 requires a response. Item 2 alleges that Calumet has not maintained adequate controls and protective equipment to control the pressure of the Bootlegger pipeline within 110% of the operating pressure limit established maximum operating pressure.

Calumet believes that adequate overpressure protection exists on its pipeline system.

Nonetheless, Calumet Montana Refining does not contest PHMSA's allegations and will comply with PHMSA's proposed Compliance Order and to have this item resolved within 180 days from receipt of the Final Order. Calumet would like to schedule a meeting with PHMSA to discuss the Compliance Order and propose options for installing its own overpressure protection system on the Bootlegger Line.

Calumet is committed to pipeline safety and looks forward to resolving this situation to PHMSA's satisfaction. Please contact me at either my office or my mobile numbers below if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Carlos Centurion".

Carlos Centurion  
Plant Manager  
Calumet Montana Refining, LLC  
(O): 406-454-9808

cc: John Kleinert - Calumet  
Clint Bishop - Calumet  
Cody McRady - Calumet  
Micah Jam - Calumet  
Terry Pearsall- Calumet  
Dan Strunk - Calumet