



February 27, 2017

Mr. Robert Burrough
 Acting Director, Eastern Region
 Pipeline and Hazardous Materials Safety Administration
 U.S. Department of Transportation
 820 Bear Tavern Road
 Suite 103
 West Trenton, NJ 08628

VIA: Electronic Mail and FedEx

**RE: CPF 1-2017-5003
 Notice of Contest and Request for Hearing**

Dear Mr. Burrough:

As of February 7, 2017, Inland Pipeline Corp. is in receipt of the above-referenced Notice of Probable Violation which includes a Proposed Civil Penalty (NOPV). Inland Pipeline Corp. is operated by Sunoco Pipeline L.P. (SPLP). Pursuant to 49 C.F.R. §190.208, SPLP timely submits this response hereby contesting in full, and respectfully requesting an in-person oral hearing, on all matters listed in such NOPV. The NOPV concerns an inspection of a pipeline repair that SPLP conducted over the week of October 12, 2015.

Additionally, Pursuant to 49 CFR 190.209 and 190.208(c), please accept this as SPLP's request for a copy of the case file including but not limited to the violation report and any penalty calculation associated with the referenced NOPV.

SPLP intends to raise legal and factual issues at the hearing which will include, at a minimum, the following along with any related issues hereafter identified:

- (1) Item 1 of the NOPV alleges that SPLP replaced a portion of an existing steel pipeline without providing the minimum 36 inches of cover between the top of the pipe and the ground thereby committing a probable violation of 195.248(a). SPLP disagrees with Item 1 and intends to describe the full design of the project including permitting complexities, the final depth of cover and other important considerations of this project.

We look forward to the opportunity to discuss this matter further at the hearing. On its behalf, SPLP expects to have individuals in attendance at a hearing which may include the following: Director of Integrity Projects, Sr. Manager – DOT Compliance, Sr. Specialist – DOT Compliance and Counsel. If the Region is inclined to discuss this matter at this time and/or after receipt of SPLP's more substantive response prior to a hearing, please do not hesitate to contact me at 610-859-5754.

Sincerely,

A handwritten signature in black ink, appearing to read "David R. Chalson", written over a horizontal line.

David R. Chalson
 Sr. Vice President, Operations
 Sunoco Pipeline L.P.

Cc: Lawrence White (Hearing Officer) (via e-mail); Adam Phillips (PHMSA Counsel) (via e-mail); Mike Slough; Leif Jensen; Todd Nardozzi; Albert Kravatz; Kevin Dunleavy, Joe Colella, Matt Studer (via e-mail)