



CERTIFIED MAIL

July 25, 2017

Mr. Robert Burrough
Acting Director, PHMSA Eastern Region
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

**RE: CPF 1-2017-5022W - Response
Kiantone Pipeline Corporation**

Dear Mr. Burrough:

This letter is in response to your Warning Letter (CPF 1-2017-5022W) dated June 28, 2017. Kiantone would like to thank the PHMSA for its understanding of the circumstances involved with Kiantone's transition to the Veriforce Operator Qualification (OQ) program and provide additional details regarding the timeline of that transition.

Please be aware that steps taken to correct OQ qualification deficiencies by changing to Veriforce were underway well in advance of PHMSA's inspection on April 4th and 5th of this year. Specifically, formal company authorization to purchase the Veriforce OQ program had been granted in May 2015, followed by execution of a contract with Veriforce later that year. Then, after several scheduling conflicts, Veriforce Evaluator Training began for Kiantone/United Evaluation Supervisors in June 2016, which also started the transitional OQ program phase to facilitate changing from the original OQ program to Veriforce's OQ program. Finally, on March 1, 2017, the transitional phase ended and Kiantone began sole reliance on the Veriforce system for compliance with Operator Qualification requirements. Thus, at the time of the PHMSA's visit in early April, the necessary OQ requirements were already being executed as required.

In conclusion, we hope that it is clear that the steps taken to correct OQ qualification deficiencies began long ago and were taken voluntarily. Kiantone will continue to take actions necessary to ensure this new OQ program remains compliant with the expectations and code requirements of the PHMSA. Thank you again for your understanding in this matter.

Very truly yours,

UNITED REFINING COMPANY

Daniel Sobina
Regulatory Compliance Manager

Cc: David Wortman