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**ST LOUIS PIPELINE OPERATING LLC**

P.O. Box 35236  
Sarasota, FL 34242  
Tel: (941) 312-0303  
Email: tampapc@outlook.com



August 28, 2017

**BY FEDEX**

Mr. Allan C Beshore  
Director, Central Regions OPS  
Associate Administrator for Pipeline Safety  
Office of Pipeline Safety, PHMSA  
U.S. Department of Transportation  
901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

Re: **St Louis Pipeline Operating LLC, CPF 3-2017-5006**  
**Contest the Allegations with an Explanation**

Dear Mr. Beshore:

This letter is in response to your decision letter dated July 27, 2017 which was received by Certified Mail on Saturday August 5, 2017. A copy of the letter is attached.

We are seeking to Contest the allegations with an Explanation.

- (1) We admit that we did not provide an on time inspection of the breakout tanks. We had a long standing former Military General Manager who retired, the inspection was missed and as soon as we found out that this was missed we promptly completed the inspection. This does not excuse us, but is a partial mitigation circumstance.

(2) We request that you consider the size of the civil penalty. The following are the audited numbers for St. Louis Pipeline Operating LLC.

Operating Revenue:

12/31/12	\$136,958.80
12/31/13	\$134,046.40
12/31/14	\$ 85,259.60
12/31/15	\$169,176.99
12/31/16	\$425,147.99

Income (loss) from Operations:

12/31/12	(\$318,465.72)
12/31/13	(\$364,032.47)
12/31/14	(\$296,805.86)
12/31/15	(\$349,251.83)
12/31/16	(\$146,675.99)

The pipeline is a dedicate jet fuel pipeline feeding Lambert International Airport, St. Louis Missouri. From 2012 we serviced one airline client and in 2016, we picked up a second airline.

The St Louis area is economically depressed and the numbers speak for themselves. Notwithstanding this we did fail to meet the deadline and we respectfully request that DOT reconsider the amount of the penalty.

Sincerely,



Robert L Rose  
President and Managing Member.