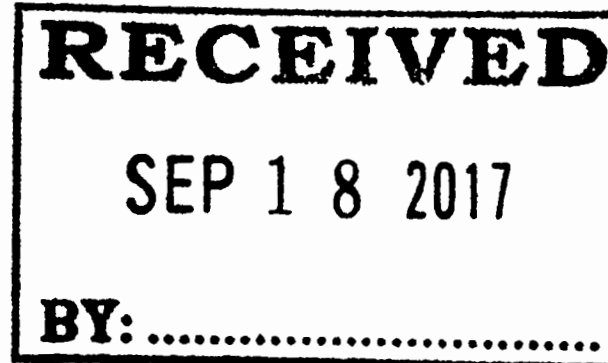


OPERATIONS OFFICES



10 Stampede Street, Newcastle, WY 82701
Phone# 307-746-4931 · Fax # 307-746-9710

September 14, 2017

Kim West
Acting Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Certified Mail No. 7016 0750 0000 4901 2437
Return Receipt Requested

RE: CPF 5-2017-6023
Response to Notice of Probable Violation and Proposed Civil Penalty Letter, dated August 15, 2017

Wyoming Pipeline Company (the "Company") has reviewed your August 15, 2017 letter regarding Notice of Probable Violation and Proposed Civil Penalty (the "NOPV") and is writing to inform you that the Company contests one allegation as described below.

Probable Violation 1 - §195.420 Valve maintenance

(b) Each operator shall, at intervals not exceeding 7½ months, but at least twice each calendar year, inspect each mainline valve to determine that it is functioning properly.

The Company does not contest this finding regarding the lack of documentation to demonstrate compliance with §195.420(b). However, §195.404(c) referenced in this finding only requires an Operator to maintain records for two (2) years, not four (4) years as stated by PHMSA in the NOPV and appears to be the basis for the civil penalty for this finding. The Company requests that the civil penalty for this finding be re-evaluated by PHMSA based upon the required two years of records (2015-2016) rather than the four years (2013-2016) indicated in the NOPV.

The Company respectfully requests that PHMSA (i) review the basis of the asserted civil penalties for potential violation 1 as discussed above; (ii) respond in writing to the Company's position concerning such potential violation; and (iii) adjust the proposed civil penalties based upon the corrections set forth above. The Company does not contest these probable violations, but seeks to ensure that the proposed civil penalties are in alignment with regulatory requirements.

If you have any questions or comments concerning the above mentioned documents, please contact me at (307) 746-9865 between the hours of 8:00 a.m. and 4:00 p.m., Monday through Friday.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E Farnsworth".

Michael E Farnsworth
Senior Vice President and Refinery Manager

cc: Mike Baldwin
Cary Colvard