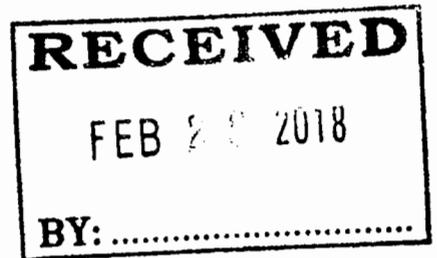


PLAINS
MARKETING, L.P.



February 21, 2018

Via Certified Mail and Electronic Mail

Mr. Dustin Hubbard
Acting Director, Western Region
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
12300 West Dakota Avenue, Suite 110
Lakewood, CO 80228

Re: CPF No. 5-2018-0003M

Dear Mr. Hubbard:

Plains All American Pipeline, L.P. ("Plains"), received a Notice of Amendment (NOA) letter from the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), dated January 25, 2018. This letter was in response to a PHMSA inspection conducted in July and August, 2017, of a 6-inch gas line that serves the Martinez Terminal in northern California.

In the letter, PHMSA identified apparent inadequacies within Plains' procedure entitled "Internal Corrosion" because it does not have a process for investigating the internal corrosive effect of the gas on the pipeline pursuant to 49 C.F.R., Subpart I, § 192.475(a) as listed below (in ***bold italicized text***):

- 1. §192.605 Procedural manual for operations, maintenance, and emergencies. (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.***

Instead Plains relies on a written statement from Pacific Gas and Electric Company (PG&E) that the gas supplied by PG&E is non-corrosive, and on PG&E's "Gas Rule No. 21" that limits corrosive compounds in its gas.

Consequently PHMSA requires that Plains must revise its procedures to include an adequate process for how it will: (1) collect the gas analysis records from PG&E and how often; (2) who will review the results; (3) the qualification of person(s) who will be reviewing the gas analysis records received from PG&E; (4) criteria for pass and fail; and (5) what steps will be taken if the gas analysis is found not meeting the specified criteria."

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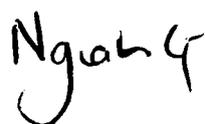
As noted in the Notice, these five items required by PHMSA are specific to the operation of the gas line at the Martinez facility. However, TransMontaigne Operating Company L.P. (TransMontaigne) became the owner of the Plains Products Terminals at Martinez and Richmond, CA, at 12:01 AM on December 15, 2017 and became the operator of record at 12:01 AM on February 13, 2018. The ownership change notification was filed with PHMSA on February 08, 2018.

Consequently, Plains respectfully requests an extension to April 30, 2018, in order to allow TransMontaigne the opportunity to respond to this Notice. TransMontaigne is in agreement with this request for extension and additionally requests that it be included in all future correspondence with PHMSA related to the NOA. Future correspondence to TransMontaigne regarding the NOA should be directed to

Pamela Cannon
DOT Compliance Coordinator
TransMontaigne Operating Company L.P.
200 Mansell Court East, Suite 600
Roswell, GA. 30076
pcannon@transmontaigne.com
(770) 518-3710-Office
(470) 226-6040-Cell

We thank you for your consideration of this matter.

Sincerely,



fr Wm. Dean Gore, Jr.,
Vice President, Environmental & Regulatory Compliance

Enclosure: Notice of Amendment CPF 5-2018-003M

cc: Pam Cannon, TransMontaigne Operating Company L.P.
John-Paul Nepote, TransMontaigne Operating Company L.P.
John Metzger, Plains
Glen Mears, Plains
Ngiabi Gicuhi, Plains