Dear Mr. Brown:

Between January 2018 and October 2018, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected the Cenex Products Pipeline between Laurel, Montana and Fargo, North Dakota. As a result of the inspection, Cenex Pipeline LLC (Cenex) was issued a Notice of Amendment (NOA) on October 22, 2019, which proposed amendment of your procedures.

I received your amended procedures dated November 21, 2019. My staff reviewed the amended procedures and it appeared that the inadequacies outlined in the Notice of Amendment had been corrected. The revised procedures for Item 3 of the NOA (Recordkeeping Procedures for Preventive and Mitigative Measures), however, were contingent upon Cenex completing its revised Integrity Management Plan (IMP). Therefore, PHMSA informed Cenex that it must submit its revised, effective IMP prior to closing the NOA.

I received your subsequent letter dated October 21, 2020 and now understand that the new IMP (revised August 13, 2020) has been implemented. In addition, my staff reviewed the written procedures attached to the response, including IMP Section 5.3 and Section 9 of Appendix H, and it appears that Item 3 has been adequately resolved. As a result of this work, all items in the NOA have been completed and this case is now closed.

Thank you for your efforts to complete these items to ensure the long-term integrity of the Cenex
Products Pipeline.

Sincerely,

DUSTIN B HUBBARD
Digitally signed by DUSTIN B HUBBARD
Date: 2020.10.28 13:49:53 -06'00'

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
    PHP-500 M. Petonis
    Michelle Slyder, Manager, DOT Compliance, Pipelines and Terminals, Cenex
    (via Michelle.slyder@chsinc.com)