

November 22, 2024

Via e-mail to robert.burrough@dot.gov

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road
Suite 300
West Trenton, New Jersey 08628

**RE: CPF No. 1-2024-033-NOPV
CPF No. 1-2024-035-NOPV
CPF No. 1-2024-036-NOPV
CPF No. 1-2024-037-NOPV
CPF No. 1-2024-038-NOPV**

Dear Mr. Burrough,

On August 30, 2024, PHMSA issued the above-referenced Notices of Probable Violation to CITGO Pipeline Company and CITGO Petroleum Corporation (collectively, CITGO). As described in the attached, CITGO respectfully requests an informal conference to attempt to resolve the above-referenced matters. CITGO hopes that a hearing will be unnecessary, and that the parties can resolve these matters informally.

To preserve its rights, CITGO also requests an in-person hearing pursuant to 49 C.F.R. §§ 190.208(a)(4), 190.208(b)(4), and 190.211(b). CITGO has attached its Preliminary Statement of Issues and Requests for Documents for each of the above-referenced cases. For the purpose of administrative efficiency and preservation of resources, CITGO requests that PHMSA consolidate these matters and schedule a single hearing to address the allegations raised in these cases.

Sincerely,



Brianne K. Kurdock

Enclosures

cc: Joseph St. Peter, Esq. (PHMSA)
Emma Ross, Esq. (PHMSA)
Ann Al-Bahish, Esq. (CITGO)
Jim Curry, Esq. (Outside Counsel for CITGO)