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Confidential Business Information and Sensitive Security Information

May 1, 2024

VIA EMAIL

Mr. Gregory A. Ochs
Director, Central Region, Office of Pipeline Safety
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Central Region Office
901 Locust Street, Suite 462
Kansas City, MO 64106
Gregory.ochs@dot.gov

Re: **CPF 3-2024-014-NOA – Operator Response**

Dear Mr. Ochs,

On February 21, 2024, the Pipeline and Hazardous Materials Safety Administration ("PHMSA"), issued a Notice of Amendment, CPF. 3-2024-014-NOA ("NOA"), to NuStar Pipeline Operating Partnership, L.P. ("NuStar") outlining alleged inadequacies found within NuStar's procedures identified during an inspection performed between May 3, 2022, and December 14, 2022. NuStar sought and received an extension of time to respond to the NOA to May 1, 2024. As such, this response is timely. This letter constitutes NuStar's formal response to the NOA. Prior to the submission of this response, NuStar and PHMSA met informally to review certain revised procedures submitted by NuStar in response to the NOA. As a result of those meetings, Items 1, 6, 7, 8 and 10 have been resolved.

Without admission, NuStar submits revised procedures for all Items of the NOA, including those previously submitted and deemed adequate by PHMSA (Items 1, 6, 7, 8, and 10), and provides the following written response to each of the alleged inadequacies described in the NOA.

To the extent PHMSA disagrees that certain items have been previously resolved, or that PHMSA asserts that NuStar's revised procedures addressing the remaining items remain inadequate, NuStar respectfully contests each item as set forth below.

NOA Allegation - Item 1: 49 CFR 195.204:

NuStar's Operations and Maintenance Manual, revised December 31, 2021, (O&M) does not provide adequate guidance for new pipeline construction as required under § 195.204. Specifically, NuStar's O&M Procedures 613 "General Guidance for Pipeline Repairs," 614 "Detailed Pipeline Repair Procedures," nor other O&M Procedures specify that NuStar designated personnel will not perform a required inspection if the same personnel performed the construction task requiring inspection.

NuStar Response to NOA Allegation – Item 1:

Without admission, NuStar revised its procedures to address this allegation of inadequacy and submitted them to PHMSA for review and approval. By email dated March 25, 2024, PHMSA confirmed that the revised procedures addressed this issue.

NOA Allegation Item 2 - 49 CFR 195.402(a):

NuStar's O&M required under § 195.402(a) is inadequate because it does not provide guidance for the identification and labeling of valves to ensure communication consistency between field and control room personnel pursuant to § 195.404(a)(1)(iv), which requires that the operator maintain current maps and records of its pipeline systems that include the location and identification of Pipeline valves.

Specifically, NuStar's O&M Procedure 315 "Valve Maintenance" Section 3.3 requires that the operator coordinate with the control room prior to maintenance or inspection. In addition, O&M Procedure 318 "Scraper and Sphere Facilities" Sections 3.3.1 and 3.3.2 require notification of the Control Center and/or the appropriate operations personnel prior to launching and after receiving pipeline pigs respectively. Further, O&M Procedures 302 "Maps and Records," Section 3.1 and 603 "Construction/Design Requirements for Pipeline Systems," Section 4.1 provide guidance for the identification and location of valves. However, PHMSA observed that valve identifications, or labels, were not present on valves, or inconsistent with P&IDs, Control Room screens, and HMI screens. NuStar's procedures do not address valve identification on field devices to ensure consistency during normal and emergency operations.

NuStar must amend its written procedures to comply with the requirements of § 195.404(a)(1)(iv).

NuStar Response to NOA Allegation – Item 2:

NuStar contests this Item, but has revised its procedures, without admission, to address the concerns identified by PHMSA in the NOA.

NuStar disagrees that 49 CFR 195.404(a)(1)(iv) requires valves to be identified in the field with onsite equipment labeling. Rather, what is required is that an operator must "maintain current maps and records" that include the "[l]ocation and identification of pipeline facilities"

including "valves". Notably, the terms P&IDs, Control Room screens and HMI Screens are not included in the regulation's text.

NuStar identifies all valves on an internal Geographical Information System (GIS). NuStar's GIS complies with 49 CFR Subpart B, §195.61 National Pipeline Mapping System and Subpart D, §195.266 Construction Records and Subpart F, §195.404 Maps and Records. NuStar continuously evaluates its maps and records. When needed, updates are made to ensure consistency between alignment sheets, P&IDs, Control Room HMI Screens and GIS data records.

NuStar and PHMSA met informally on several occasions to discuss the issue. Without admission, NuStar revised its procedures to better clarify the process by which NuStar personnel in the field and control room communicate to identify the location of valves, and the maps and documentation on which the controller and the field personnel rely in order to identify the location of valves to ensure consistency during normal and emergency operations.

PHMSA's Response to Revised Procedures (quoted in red italics below):

By email dated March 25, 2024, PHMSA responded to the revised procedures as follows:

NuStar's submitted procedure 302 requires further refinement.

Details:

NuStar's Procedure 302, section 3.2 states, "Should an instance arise where maps and records are inaccurate and/or are not available, personnel may utilize onsite labeling to facilitate the identification of valves for field and control room interactions."

To avoid confusion and provide guidance, the word 'may', needs to be stronger and the language should be closer to what is in API RP 1165 (incorporated by reference), Section 11.3, which states, "To avoid confusion and enhance communications between control center personnel and field personnel, displays, control panels, and other indicators used in both locations should be consistent. This could include, but not be limited to, colors, symbols, text and labels. Naming conventions including equipment tags, station names, and other identifiers between the control center and remote locations should be standardized.

NuStar's Reply to PHMSA's Response to Revised Procedures:

NuStar contests this Item and submits that the regulation does not require a prescriptive manner by which valves must be labeled for purposes of identification between field and control room personnel. Without admission, NuStar further revised its procedures to provide the following:

NuStar notes that it updated its procedures to be consistent with the recommended guidance contained in API RP 1165 and cited by PHMSA in response to the initial revisions. NuStar further notes that neither the regulation nor API RP 1165 mandates the prescriptive manner by which PHMSA believes NuStar's valves should be labeled and allows for instances where the naming convention is not entirely consistent so long as communication between the controller and field personnel is clear is it relates to the location of the valves.

API RP 1165, Section 11.3 reads as follows:

"Consistency between control centers and remote location: To avoid confusion and enhance communications between control center personnel and field personnel, displays, control panels, and other indicators used in both locations *should* be consistent." (emphasis added).

The use of the word "should" in the recommended guidance document, and the absence of any prescriptive labeling convention set forth in the regulatory text rebut PHMSA's position that the labeling convention *must* be consistent to comply with § 195.404(a)(1)(iv). The regulatory requirement is that an operator maintain accurate maps and records that include location and identification of valves, among other things. NuStar maintains such maps and records and its procedures set forth guidance to personnel on how to access such maps and records and how to proceed with identifying the location of valves in event that maps and records are missing or inaccurate.

NuStar's procedures and the revisions thereto meet the standard required by the regulations.

NOA Allegation Item 3 - 49 CFR 195.402(a):

NuStar's O&M Procedure 315 "Valve Maintenance" required under § 195.402(a) is inadequate because it does not define what valves are necessary for the safe operation of the pipeline pursuant to § 195.420(a). Section § 195.420(a) states, "Each operator shall maintain each valve that is necessary for the safe operation of its pipeline systems…." Specifically, NuStar's procedures must provide guidance on how to differentiate and maintain valves necessary for safe operation other than mainline valves. In addition, the procedures do not define the inspection period(s) for valves necessary for the safe operation of the pipeline system other than mainline valves. In addition, the procedures do not define how NuStar plans to maintain valves necessary for the safe operation other than mainline valves.

NuStar Response to NOA Allegation – Item 3:

NuStar previously submitted revised procedures, without admission, to address the alleged inadequacy identified in the NOA.

PHMSA's Response to Revised Procedures (quoted in red italics below):

By email dated March 25, 2024, PHMSA responded to the revised procedures as follows:

NuStar's proposed procedure 315 (March XX, 2024) requires further refinement.

Details:

Although procedure 315, Section 3.1 has been modified to include a definition that all valves associated with pipeline facilities used in the transportation of hazardous liquids are necessary, no inspection schedule is defined.

NuStar Reply to PHMSA's Response to Revised Procedures:

NuStar contests that its original and revised O&M Procedure, Section 315, was inadequate to ensure the safe operation of a pipeline facility. NuStar further contests the statement in the NOA that § 195.420(a) requires a defined inspection schedule, it does not. Section 194.420(a) merely states that each operator "shall maintain each valve that is necessary for the safe operation of its pipeline systems in good working order at all times." There is no reference whatsoever to a prescribed inspection schedule, in contrast to § 195.420(b), which has an explicit inspection schedule for mainline valves only.[1] The absence of a defined inspection schedule in § 195.420(a), and the inclusion of one in § 195.420(b) for mainline valves, taken together, can only be read to mean that valves necessary for the safe operation of the pipeline that are not mainline valves are not required to be under a prescribed inspection schedule, but rather, that the operator has a duty to maintain them so they remain in good working order at all times. How and when an operator does that is entirely up to operator judgment and discretion, but specifically does not require a prescribed inspection schedule.

PHMSA's additional concerns with NuStar's revised procedures are addressed below.

The procedures go on to state that valves necessary include each valve illustrated in Figures 3.1 through 3.7. However, the following types of valves are not included in the Figures/descriptions (provided that these valves are not defined as mainline valves).

- *On each line entering and leaving a Breakout Storage area.*
    - NuStar directs PHMSA to the enclosed **Engineering Standard -NS-ES-40-024**
- *On each mainline at locations on the system to protect the environment - something potentially like this . . . on each mainline at locations along the pipeline system that will minimize damage or pollution from accidental hazardous liquid discharge, as appropriate for the terrain in open country, for offshore areas, or for populated areas.*
    - NuStar directs PHMSA to the enclosed **Engineering Standard -NS-ES-40-024 and O&M Appendix D4**
- *Although mainline valves are defined in procedure 315, section 3.1. want to ensure this encompasses ALL water crossing valves.*

[1] 49 CFR 195.420(b) ("Each operator must, at least twice each calendar year, but at intervals not exceeding 7 1/2 months, inspect each ***mainline valve*** to determine that it is functioning properly.") (emphasis added).

- NuStar responds that water crossing valves are defined as mainline valves, and directs PHMSA to the enclosed **Engineering Standard -NS-ES-40-024 and O&M Appendix D4.**

- For example, there may be smaller water crossings where valves necessary for safe operation are present and not identified as mainline valves (e.g. for spare water crossing lines, or valves crossing water crossings that are 100 ft wide or more, etc).

    - NuStar states that if smaller crossing valves are required, they are also considered mainline valves, and directs PHMSA to the enclosed **Engineering Standard -NS-ES-40-024 and O&M Appendix D4.**

- On each side of a reservoir holding water intended for human consumption.

    - NuStar directs PHMSA to the enclosed **Engineering Standard -NS-ES-40-024 and O&M Appendix D4.**

- EFRD valves that may not be identified as mainline valves, but would be valves necessary for safe operation (as applicable).

    - NuStar treats all EFRD's as mainline valves, subject to **O&M Procedure 315 – Valve Maintenance.**

- Additional valve location considerations by engineering, etc.
  Something potentially like this should be in the procedures or standards -- "The project engineer/engineering team are responsible for establishing and specifying the valve location requirements for a pipeline construction project and to identify the valves necessary for the safe operation of the pipeline system.

    - NuStar directs PHMSA to the enclosed **Engineering Standard -NS-ES-40-024 and O&M Appendix D4.**

NOA Allegation Item 4 - 49 CFR 195.402(c)(3):

NuStar's O&M Procedure 315 "Valve Maintenance" required under § 195.402(c)(3) is inadequate because the procedures do not provide detailed guidance for how valve inspections are to be performed to ensure that the valve is functioning properly pursuant to § 195.420(b).

Section § 195.420(b) states, "Each operator must, at least twice each calendar year, but at intervals not exceeding 71/2 months, inspect each valve to determine that it is functioning properly. Each rupture-mitigation valve (RMV), as defined in § 195.2, or alternative equivalent technology that is installed under § 195.258(c) or § 195.418, must also be partially operated.

Operators are not required to close the valve fully during the drill; a minimum 25 percent valve closure is sufficient to demonstrate compliance, unless the operator has operational information that requires an additional closure percentage for maintaining reliability."

Specifically, Section 3.3 of O&M Procedure 315 outlines mainline valve inspection procedures and in step 4 instructs field personnel that Form 6101 (Valve Inspection Report), Form 6109 (Ammonia Line Break Operator Inspection Report), or similar is to be prepared. However, the procedures do not adequately outline specific steps needed for the different types of mainline valves, such as motor-operated valves, manual valves, line break valves, etc. In addition, the procedures do not address the inspection of RMVs, remote-control valves (RCVs), alternative technology, etc.

NuStar Response to NOA Allegation – Item 4:

NuStar contests this Item to the extent PHMSA reads § 195.420(b) to apply to all valves and not mainline valves, as specifically called out in the regulatory text, or that the regulation requires a specific step-by-step procedure for maintaining each mainline valve in good working order.[2] The regulation mandates no such prescriptive process that the Region asserts is required. Without admission, NuStar revised its procedures to address the concerns identified in the NOA and submitted them for review by PHMSA.

PHMSA's Response to Revised Procedures (quoted in red italics below):

By email dated March 25, 2024, PHMSA responded to the revised procedures as follows:

NuStar's proposed procedure 315 (March XX, 2024) requires further refinement.

Details:

- Is the title of Section 3.3 intended for all valves? Or just mainline valves?
- If valves are designated as EFRD valves (perhaps prior to the new valve rule) and require inspection, additional guidance is warranted.
- Form 6109 (Ammonia Line Break Operator Inspection) is not included in the O&M, while Form 6101 is.
- Additional inspection guidance is needed for LBO valves.
- More step-by-step guidance, the better. The procedures should provide adequate guidance for different valve types (as needed).

NuStar Reply to PHMSA's Response to Revised Procedures:

Without admission, NuStar has further revised its procedures to address the additional concerns raised by PHMSA and quoted above.

Section 3.3 has been updated to clarify that it applies to mainline valves.

[2] *See supra*, at n. 1.

O&M Procedure 315 has been further revised with the following clarifying language:

[redacted]

This language is consistent with the requirements of the regulation and provides adequate guidance to NuStar personnel on how to maintain mainline valves to ensure that the valves are functioning properly. Section 195.420(b) does not mandate a prescriptive inspection requirement for checking motor-operated valves/EFRDs.

Nustar's revised procedures now include form 6109 in the form section of its O&M Manual. Its prior exclusion was an error when transmitting the initial revised procedures in response to the NOA.

NuStar reiterates that § 195.420(b) does not require step-by-step guidance, or some prescriptive measure, by which mainline valves are to be inspected. NuStar O&M Manual procedure 315, subsection 3.3 applies to all mainline valves. The procedure provides adequate guidance to NuStar personnel on how to maintain mainline valves in good working order and meet the requirements of the regulation.

NOA Allegation Item 5 - 49 CFR 195.402(c)(3):

NuStar's Corrosion Control Manual, required under § 195.402(c)(3), is inadequate because it does not include instructions that the operator must inspect all pipe coating prior to lowering the pipe into the ditch or submerging the pipe pursuant to § 195.561(a). Section § 195.561(a) states, "You must inspect all external pipe coating required by § 195.577 just prior to lowering the pipe into the ditch or submerging the pipe."

Specifically, the Corrosion Control Manual, Section 3.8 - Coating Inspections "New Construction and Repairs," does not reference NuStar's engineering standard NS-ES-20-001 Version D "Pipeline Construction." In addition, NS-ES-20-001 in Section 11.5 "Holiday Inspection" outlines in Table 1 the requirements for holiday detection. However, Table 1 does not cover jeep/holiday detection for Abrasion Resistant Overcoat (ARO) coating.

NuStar Response to NOA Allegation – Item 5:

Without admission, NuStar submitted revised procedures to address the concerns raised by the NOA.

PHMSA's Response to Revised Procedures (quoted in red italics below):

By email dated March 25, 2024, PHMSA responded to the revised procedures as follows:

NuStar's proposed revised corrosion control procedures (dated Dec 1, 2023) require further refinement.

Details:

While Section 3.8 of the Corrosion procedures (dated Dec 1, 2023) now references NS-ES-20-001, which in Section 11.5 outlines in Table 1 the requirements for holiday detection, additional language, or direction, is needed for how NuStar will inspect for holidays in ARO coating prior to 'lowering into the ditch', or being pulled through the bore hole.

NuStar Reply to PHMSA's Response to Revised Procedures:

Without admission, NuStar has further revised its procedures to address the additional concern raised by PHMSA. Specifically, NuStar's Corrosion Control Manual, version 9.0 and dated April 2024, has been revised to include section 3.9 "Coating Inspections (HDD Applications)". The revised procedures address PHMSA's concerns and are consistent with the requirements of the Code.

NOA Allegation Item 6 - 49 CFR 195.402(c)(3):

NuStar's Liquid Pipeline Integrity Management Program and Procedures Manual, Version 9.0, (IMP) required under § 195.402(c)(3) is inadequate because the IMP Plan in Appendix I "SCC Management Plan" does not provide adequate guidance for Stress Corrosion Cracking (SCC) Direct Assessment, pursuant to § 195.588(c). Section § 195.588(c) states, "If you use direct assessment on an onshore pipeline to evaluate the effects of stress corrosion cracking, you must develop and follow a Stress Corrosion Cracking Direct Assessment plan that meets all requirements and recommendations of NACE SP0204-2008 (incorporated by reference)…." However, Appendix I of NuStar's IMP Plan incorporates by reference only certain sections of NACE SP0204-2008. PHMSA requires that the SCC Direct Assessment plan meet all of the requirements of NACE SP0204-2008.

NuStar Response to Allegation – Item 6:

Without admission, NuStar revised its procedures to address this allegation of inadequacy and submitted them to PHMSA for review and approval. By email dated March 25, 2024, PHMSA confirmed that the revised procedures addressed this issue.

NOA Allegation Item 7 - 49 CFR 195.440(a):

NuStar's Public Awareness Program, revised December 31, 2021, (PA Plan) required under § 195.440(a) is inadequate because it does not provide adequate guidance to address supplemental communication evaluation review and documentation as required under § 195.440(i). Section § 195.440(i) states, "The operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies." Specifically, NuStar's PA Plan in Section 3.7.1 "Supplemental Communication Evaluation Process" states that the Public Awareness Committee shall conduct a review every other year

and additional reviews may be conducted if evaluation factors have changed significantly. However, the PA Plan does not outline where, or how, this review is to be documented. NuStar's current practice, based on PHMSA observations, is to use Forms 6207 and/or 6301. However, neither form is identified in the procedures.

NuStar must amend its written PA Plan to clarify documentation requirements to comply with § 195.440(i).

NuStar Response to Allegation – Item 7:

Without admission, NuStar revised its procedures to address this allegation of inadequacy and submitted them to PHMSA for review and approval. By email dated March 25, 2024, PHMSA confirmed that the revised procedures addressed this issue.

NOA Allegation Item 8 - 49 CFR 195.452(f)(1):

NuStar's Facility Integrity Management Program, Version 1, (FIMP) does not provide adequate guidance for air-dispersion modeling and is therefore inadequate to comply with § 195.452(f)(1). Specifically, the FIMP does not incorporate an air dispersion model for ammonia an release from a pump station or facility. The air-dispersion modeling is carried out in accordance with NuStar's IMP Plan, Section 1.4 for mainline pipe. However, the FIMP Plan does not incorporate a reference to the IMP Plan for air-dispersion modeling.

NuStar must amend its written procedures to comply with the requirements of § 195.452(f)(1).

NuStar Response to Allegation – Item 8:

Without admission, NuStar revised its procedures to address this allegation of inadequacy and submitted them to PHMSA for review and approval. By email dated March 25, 2024, PHMSA confirmed that the revised procedures addressed this issue.

NOA Allegation Item 9 - 49 CFR 195.452(f)(3):

NuStar's IMP procedures required under § 195.452(f)((3) are inadequate because the procedures do not provide proper guidance for the evaluation methods of geotechnical threats pursuant to § 195.452(g)(1)(xxi).

Section § 195.452(g)(1)(xxi) states that the operator, "Integrate information and attributes about the pipeline that include…. Other pertinent information derived from operations and maintenance activities and any additional tests, inspections, surveys, patrols, or monitoring required under this part."

Specifically, the IMP procedures in Sections 7.1 and 7.2 do not outline specific methods to be used for the evaluation of geotechnical threats. In addition, Appendix D of the IMP procedures note that internal navigation tools are useful for mapping. However, the procedures do not indicate that Inertial Measurement Unit (IMU) inline inspection, or other tools are to be used to analyze geotechnical threats and/or pipeline strain. PHMSA's Advisory Bulletin, ADB 2022-0063, outlines additional guidance an operator should consider in order to address the

potential for damage to pipeline facilities caused by earth movement and other geological hazards.

NuStar must amend its IMP procedures to comply with the requirements of § 195.452(g)(1)(xxi).

NuStar Response to Allegation – Item 9:

Without admission, NuStar previously submitted revised procedures to address the concerns identified in the NOA.

PHMSA's Response to Revised Procedures (quoted in red italics below):

By email dated March 25, 2024, PHMSA responded to the revised procedures as follows:

NuStar's revised IMP procedures (version 9.2) require further refinement.

Details:
The IMP Plan version 9.2, in Section 6, section 6.2.1, identifies geo-technical hazards as a threat (pg 6-4).
However, in Table D-1 of Appendix D, footnote 16, or other footnote, etc., should include language that this ILI method, or other means, can be used to help monitor geo-technical threats.
Footnote 16 currently states, *"mapping tools may be used to identify areas of bend strain. If integrated with other data such as MFL, this can detect areas of susceptible circumferential cracking"*

NuStar Reply to PHMSA's Response to Revised Procedures:

Without admission, NuStar has further revised its procedures to address the additional concerns raised by PHMSA.

Appendix D, Sections 1.2 and 1.4, of the NuStar Pipeline IMP Manual version 9.3 provides further clarification on how bend strain events are associated with geo-technical hazards. This section ties bend strain events to circumferential crack-like defects as a causal factor and addressed PHMSA's concerns and the regulatory requirements.

NOA Allegation Item 10 – 49 CFR 195.452(f)(3):

NuStar's IMP procedures required under § 195.452(f)((3) are inadequate because the procedures do not include the appropriate assessment methods associated with pipeline circumferential crack integrity threats pursuant to § 195.452(j)(5)(i).

Section § 195.452(j)(5)(i) states, "…. For pipeline segments that are susceptible to cracks (pipe body and weld seams), an operator must use an in-line inspection tool or tools capable of detecting crack anomalies…."

The IMP procedures Appendix D specifies "Anomaly Types, Detection Tools, and Assessment Methods" that are appropriate to specific integrity threats. However, the IMP procedures do

not include methods for assessing circumferential stress corrosion cracking, which was identified as the cause of failure of NuStar's 10-inch pipeline from Chatham, Louisiana to Hampton, Arkansas, near El Dorado, Arkansas on February 27, 2022.

NuStar must amend its written procedures to include additional assessment methods for circumferential SCC as applicable to its pipeline systems in order to comply with the requirements of § 195.452(j)(5)(i).

NuStar Response to Allegation – Item 10:

Without admission, NuStar revised its procedures to address this allegation of inadequacy and submitted them to PHMSA for review and approval. By email dated March 25, 2024, PHMSA confirmed that the revised procedures addressed this issue.

NOA Allegation Item 11 – 49 CFR 195.206:

NuStar's Standard NS-ES-20-001 is inadequate because it does not specify that Horizontal Directional Drilling (HDD) pipe coating and pipe be inspected after being pulled through the bore hole to document and verify the piping and coating were not damaged during the HDD pull in manner that could impair its strength or reduce its serviceability.

NuStar must amend its written procedures to include inspection of HDD pipe coating and pipe after it is pulled through the bore hole, and any remedial actions that should be taken if such damage is found, to comply with the requirements of § 195.206.

NuStar Response to Allegation – Item 11:

NuStar contests the allegation to the extent PHMSA asserts that § 195.206 requires post installation inspections. Section 195.206 is specific in that it requires visual inspection of pipe and components before installation.

Without admission, NuStar has revised its procedures to address the concerns raised by PHMSA in the NOA and refers PHMSA to Section 3.9.1 of its Corrosion Control Manual, and Section 14.1 of engineering standard NS-ES-20-001. The procedures now explicitly clarify that they apply to pull-back (HDD) and related visual inspections both before and after the pipe is pulled through when performing an HDD installation.

Very truly yours,

Van Ness Feldman, LLP

Joseph Hainline

Joseph E. Hainline, Partner
Outside Counsel for NuStar Energy L.P.

Attachments

cc: Mr. Ryan McClure, Central Region Counsel, OPS, PHMSA, ryan.mcclure@dot.gov
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