



April 16, 2021

Ms. Mary L. McDaniel, Director  
Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 South Gessner Road #630  
Houston, Texas 77074

RE: Pipeline and Hazardous Materials Safety Administration Notice of Amendment # CPF 4-2021-024:

Holly Energy Partners (HEP) is in receipt of the Pipeline and Hazardous Materials Safety Administration (PHMSA) Notice of Amendment # CPF 4-2021-024, received as of March 25, 2021.

HEP's response to the notice of amendment is as follows:

**NOA –**

***195.402 Procedural manual for operations, maintenance, and emergencies.***

***(a)...***

***(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations.***

***(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.***

***195.583 What must I do to monitor atmospheric corrosion control?***

***(a) You must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:***

| <b><i>If the pipeline is located:</i></b> | <b><i>Then the frequency of inspection is:</i></b>                                              |
|-------------------------------------------|-------------------------------------------------------------------------------------------------|
| <b><i>Onshore</i></b>                     | <b><i>At least once every 3 calendar years, but with intervals not exceeding 39 months.</i></b> |

|                 |                                                                                   |
|-----------------|-----------------------------------------------------------------------------------|
| <b>Offshore</b> | <b><i>At least once each calendar year, but with intervals not exceeding.</i></b> |
|-----------------|-----------------------------------------------------------------------------------|

***(b) During inspections you must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.***

***(c) If you find atmospheric corrosion during an inspection, you must provide protection against the corrosion as required by §195.581.***

**Description:**

Written procedures and forms, to include the HEP O&M-195.583 Monitoring Atmospheric Corrosion, HEP-A-195.000 Pipeline Safety Manual and related procedures, are inadequate because they do not provide guidance for how to monitor for atmospheric corrosion as required by § 195.583.

**Action Item:**

Amend O&M procedures for monitoring atmospheric corrosion to include a process for conducting atmospheric inspections and provide guidelines in the "good," "fair," and "poor" categories to include clear thresholds for determining the grading of a pipeline coating condition.

**Action Taken:**

HEP has amended Subpart H - HEP Corrosion Control Procedures of the O&M, updated the Atmospheric Corrosion Monitoring, Inspection and Mitigation procedure and revised the Atmospheric Corrosion Inspection form.

Please find enclosed additional details on each of the above referenced documents.

Should you have any questions, please contact Bridgette Taylor at (214) 954-6652 or via email at [Bridgette.Taylor@hollyenergy.com](mailto:Bridgette.Taylor@hollyenergy.com).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark Cunningham', is positioned above the typed name.

Mark Cunningham, Sr. VP, Operations & Engineering  
Holly Energy Partners

Attachments:      A: Excerpts from Subpart H of the Operations and Maintenance (O&M)  
                             Manual  
                             B: Atmospheric Corrosion Monitoring, Inspection and Mitigation  
                             Procedure  
                             C: Atmospheric Corrosion Inspection Form

cc:      Lori Coupland, Director, Compliance & EHS  
            Bridgette Taylor, Pipeline Regulatory Manager