



October 22, 2021

Ms. Mary L McDaniel, P.E.
Director, Southwest Region
Pipelines and Hazardous Materials Safety Administration
8701 South Gessner Rd
Houston, TX 77074

RE: CPF 4-2021-043-NOA

Dear Ms. McDaniel:

On September 24, 2021, PHMSA issued a Notice of Amendment ("NOA" or "Notice") to Valero Partners Operating Co. ("Valero"), which Valero received the same day. The NOA referenced Valero's *Operation, Maintenance, and Emergency Procedures Manual, Revision 5.0 (September 2019)* and identified 42 apparent inadequacies. Valero hereby submits its initial response to the NOA and respectfully requests an extension of time for Valero to complete amending its procedures.

Valero Response:

Valero does not contest the Notice. For the past several months (including prior to receiving the Notice), Valero has been working to make significant changes to its Operations, Maintenance and Emergency Manual that include reformatting the document's structure, developing a framework for procedures, creating digital inspection and maintenance forms, aligning procedures with the revised Valero Operator Qualification Program that became effective in July 2021, and now addressing each inadequacy PHMSA identified in the Notice.

Valero's goal is to bring the Manual into compliance and do so in a timely manner that is agreeable to PHMSA. Due to the scope of changes Valero is implementing, the 30-day deadline does not allow time to complete the modifications, conduct subject matter expert reviews and gain management approvals of the new Manual through Valero's Management of Change process. We respectfully request that PHMSA extend the deadline for Manual completion and submission to address the Notice until March 31, 2022. Valero will submit the completed Manual by this date and will provide progress updates to PHMSA upon request.

Valero is committed to working with PHMSA to ensure compliance with all pipeline safety regulations, and Valero appreciates the professionalism of the inspectors involved in the inspection. Their comments and suggestions are valuable and appreciated. Please contact Darin Banther at (210) 345-4171 or by email Darin.Banther@valero.com, should there be any questions.

Sincerely,

A handwritten signature in black ink that reads 'J. Carlos Gauna'.

J. Carlos Gauna
Director Pipeline and Facility Integrity
Valero Partners Operating Company, LLC