



March 29, 2023

Mr. Bryan Lethcoe, 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 4-2023-040-NOA.

Holly Energy Partners (HEP) is in receipt of the Pipeline and Hazardous Materials Safety Administration (PHMSA) Notice of Amendment # CPF 4-2023-040-NOA, received as of March 6, 2023.

Please see the following regarding HEP's response to noted procedure inadequacies:

Related to Item #1):

§ 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:

(1)

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

§ 195.414 Inspections of pipelines in areas affected by extreme weather and natural disasters.

(a) . . .

(d) Remedial action. An operator must take prompt and appropriate remedial action to ensure the safe operation of a pipeline based on the information obtained as a result of performing the inspection required under paragraph (a) of this section. Such actions might include, but are not limited to:

(1) Reducing the operating pressure or shutting down the pipeline;

(2) Modifying, repairing, or replacing any damaged pipeline facilities;

(3) Preventing, mitigating, or eliminating any unsafe conditions in the pipeline right-of-way;

- (4) Performing additional patrols, surveys, tests, or inspections;*
- (5) Implementing emergency response activities with Federal, State, or local personnel; and*
- (6) Notifying affected communities of the steps that can be taken to ensure public safety.*

Cited Procedure Inadequacies #1:

Respondent's procedures for conducting operations, maintenance, and emergency preparedness and response activities were inadequate to assure safe operation of a pipeline facility in accordance with § 195.402(c)(3). Specifically, Holly's procedure, Operations and Maintenance Procedure, HEP-A-195.000 Pipeline Safety Manual, Section 195.414, dated 1/1/2022 (O&M Procedure), failed to include the remedial actions it must take following an extreme weather event in accordance with § 195.414(d).

HEP Response:

HEP recognizes the importance of thoroughly reviewing all applicable procedures to better ascertain revisions potentially needed. As a result, certain amendments may have an affect on several other procedures; therefore, HEP respectfully requests a 30-day extension from the date of this response letter to allow for a more thorough review of procedures in order to amend and prepare a final response to PHMSA.

Should there be any questions related to HEP's response to this Notice of Amendment and request for extension, please contact Bridgette Taylor at (214) 954-6652 or via email at Bridgette.Taylor@hollyenergy.com.

Sincerely,



Lori Coupland, VP, Compliance & EHS
Holly Energy Partners

cc: Rob Jamieson, SVP and COO, Holly Energy Partners
Bridgette Taylor, Pipeline Regulatory Manager