



June 9, 2025

Mr. Bryan Jeffery Lethcoe
Director, Southwest Region
Pipelines and Hazardous Materials Safety Administration
8701 S. Gessner
Suite 630
Houston, TX 77074

RE: CPF 4-2025-001-NOA

Dear Mr. Lethcoe,

A representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) conducted a pipeline safety inspection of Valero Terminal and Distribution Company's (Valero) hazardous liquid pipeline facilities in Oklahoma, Louisiana, Mississippi and Texas from March 11th through September 27th, 2024.

On May 22nd, 2025, the Office of Pipeline Safety issued a Notice of Amendment letter identifying an apparent inadequacy found within a Valero procedure. This letter is intended to provide responses to the Notice in accordance with 49 CFR 190.208.

Valero is committed to working with PHMSA to ensure compliance with all pipeline safety regulations, and Valero appreciates the professionalism of the inspector involved in the inspection. Their comments and suggestions are valuable and appreciated. If you have any questions or need additional information please contact Darin Banther at (210) 345-4171 or Carlos Gauna at (210) 345-5208.

Respectfully Submitted,

A handwritten signature in blue ink that reads 'Fred E Hampton'.

Fred E. Hampton
Vice President

Enclosure

cc: Mr. Carlos Gauna, Director Pipeline and Facility Integrity, Valero Partners Operating Company, LLC, carlos.gauna@valero.com
Mr. Darin Banther, Manager Regulatory Compliance, Valero Partners Operating Company, LLC, darin.banther@valero.com



Item Number: 1

Requirement: 49 CFR 195.452 Pipeline Integrity Management Program for High Consequence Areas

Apparent Inadequacy Description:

Valero's written integrity management program was inadequate to provide safe operation of a pipeline facility in accordance with § 195.452(f)(3). Specifically, Valero's Liquid Pipeline Integrity Management Program (Rev. 4.5; Eff. May 1, 2024), Section 6.6. Facility Risk Management, does not include an analysis that integrates all available information about the integrity of the entire pipeline and the consequences of failure in periodically evaluating the integrity of each pipeline segment under paragraph (g).

Therefore, PHMSA proposes Valero revise its integrity management program procedure to include a procedure for analyzing all information about the integrity of its entire pipeline and the consequences of a failure in accordance with § 195.452(f)(3).

Response:

Valero does not contest this apparent inadequacy and intends to take the following corrective action:

- Revise the Valero integrity management program procedure to include a procedure for analyzing all information about the integrity of its entire pipeline and the consequences of a failure in accordance with §195.452(f)(3).
- Submit the amended procedure to the Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration within **60** days of receipt of this Notice.