

February 14, 2025

Mr. Bryan Lethcoe
Southwest Region Director, PHMSA

Re: CPF 4-2024-021-NOPV – Response to Notice of Probable Violation

Mr. Lethcoe

Sinclair Transportation Company, LLC (“Sinclair”) has received and reviewed your letter dated January 08, 2025, which details the alleged probable violations identified during the onsite inspection conducted from February 27 to May 11, 2023. We acknowledge these findings and appreciate the thoroughness of PHMSA’s review.

Sinclair does not contest the alleged probable violations cited under the following regulations:

1. **49 CFR § 195.310 – Records (Pressure Testing)**
2. **49 CFR § 195.430 – Firefighting Equipment**
3. **49 CFR § 195.452 – Pipeline Integrity Management**

We understand that PHMSA has proposed a Compliance Order to address these concerns and has provided an opportunity to respond within 30 days. In alignment with our commitment to operating in a safe and compliant manner, Sinclair will take all necessary steps to address and remediate the issues noted in the inspection report.

Proposed Actions

- **Recordkeeping Improvements:** We will enhance our pressure test documentation to ensure that all data required by § 195.310—including instrument calibration, test facility descriptions, and any pressure discontinuities—are consistently recorded and retained.
- **Firefighting Equipment Maintenance:** We are performing a thorough review of our firefighting equipment pump stations and breakout tank areas, particularly at the Bairoil Pump Station. We will ensure that equipment is available, clearly marked, accessible, and remains in proper operating condition at all times.
- **Integrity Management Program Updates:** Sinclair will implement the requisite spill modeling at Cheyenne Station and any other locations with breakout tanks, adhering to our documented IM-100 Volume Release & HCA Impact Procedure.

We are already initiating corrective measures and will fully comply with each element of the Proposed Compliance Order. Should PHMSA require additional information or documentation, please let us know, and we will promptly provide it. Sinclair’s goal is to maintain the highest standards of safety and regulatory compliance, and we appreciate PHMSA’s guidance and cooperation throughout this process.

If you have any questions or need further clarification, please contact me at 505-273-0339 or via email at Charles.curl@hfsinclair.com.

Sincerely,

/s/ Charles Curl | Director, Regulatory

HF Sinclair Midstream

(505) 273-0339