

November 21, 2025

Ms. Dolores Francis  
Presiding Official, Pipeline Safety  
Pipeline and Hazardous Materials Safety  
Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Via Email: Dolores.Francis@DOT.gov

Re: Denbury Gulf Coast Pipelines, LLC (“Respondent Denbury”)  
**Motion to Dismiss**  
CPF No. 4-2025-024-NOPV

Dear Ms. Francis:

Respondent Denbury hereby submits to the administrative record the attached Motion to Dismiss Denbury Gulf Coast Pipelines, LLC (“Motion to Dismiss”). Respondent Denbury respectfully requests your consideration of its Motion to Dismiss, especially in light of this Administration’s policy, which was set forth in the Memorandum from the U.S. Department of Transportation Acting General Counsel Mr. Gregory D. Cote dated March 11, 2025, that “If the evidence is not sufficient to support the proposed enforcement action,...[t]he reviewing attorney or agency component may also recommend the closure of the case for lack of sufficient evidence.” Such is the case in this enforcement action, which must be withdrawn as against Respondent Denbury.

The Motion to Dismiss is being provided to Chief Counsel Keith Coyle, Region Counsel Timothy O’Shea, as well as Director, Southwest Region, Bryan Lethcoe.

Additionally, Respondent Denbury does, of course, expect that the Motion to Dismiss will be posted on the PHMSA Pipeline Safety Enforcement Transparency Webpage.

Thank you for your attention to this matter.

Sincerely,



Haley O’Neill  
Counsel for Respondent Denbury

Ms. Dolores Francis  
November 21, 2025  
Page 2

cc: Keith Coyle ([keith.coyle@dot.gov](mailto:keith.coyle@dot.gov))  
Timothy O'Shea ([timothy.o'shea@dot.gov](mailto:timothy.o'shea@dot.gov))  
Bryan Lethcoe ([bryan.lethcoe@dot.gov](mailto:bryan.lethcoe@dot.gov))  
Jerry Cox ([jcox@potomacstrategyassociates.com](mailto:jcox@potomacstrategyassociates.com))  
Rodney Barnwell ([rodney.b.barnwell@exxonmobil.com](mailto:rodney.b.barnwell@exxonmobil.com))  
Angela Offerman ([angela.offerma@exxonmobil.com](mailto:angela.offerma@exxonmobil.com))  
Vince Murchison ([vince.murchison@pipelinelegal.com](mailto:vince.murchison@pipelinelegal.com))  
Roina Rivera ([roina.rivera@pipelinelegal.com](mailto:roina.rivera@pipelinelegal.com))