

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY**

In the Matter of

Holly Energy Partners, LP ,

Respondent.

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CPF No. 4-2025-031-NOPV

**REQUEST FOR INFORMAL CONFERENCE, HEARING, AND PRELIMINARY
STATEMENT OF ISSUES**

I. Request for Informal Conference

Pursuant to 49 U.S.C. § 60117(b)(1)(B)(i)-(ii), Holly Energy Partners, LP (HEP) respectfully requests an informal conference to discuss the allegations and proposed compliance order in the above-referenced Notice of Probable Violation and Proposed Compliance Order (NOPV). HEP is hopeful that through further discussion these allegations can be resolved without a hearing.

II. Request for Hearing

Pursuant to 49 C.F.R. §§ 190.208(b)(4) and 190.211(b), HEP respectfully requests an in-person hearing at PHMSA's Southwest Region office to discuss the proposed compliance order. If a hearing is held, HEP will be represented by counsel at the hearing.

III. Preliminary Statement of Issues

HEP respectfully contests the allegations and proposed compliance order in the NOPV. At the hearing, HEP intends to raise the following issues:

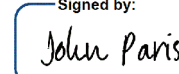
Item 1-49 C.F.R. § 195.54(a)

- A. Whether the allegation of violation is supported by the facts and the evidence.
- B. Whether PHMSA has met its burden of proof that a probable violation has occurred.
- C. Whether the proposed compliance order is appropriate or should be modified or withdrawn.

Item 2-49 C.F.R. § 195.507(b)

- A. Whether the allegation of violation is supported by the facts and the evidence.
- B. Whether PHMSA has met is burden of proof that a probable violation has occurred.
- C. Whether the proposed compliance order is appropriate or should be modified or withdrawn.

Respectfully submitted this 5 day of March
2026.

Signed by:

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