



MIDSTREAM

January 23, 2026

Via E-mail to Bryan.Lethcoe@dot.gov

Bryan Lethcoe
Director, Southwest Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074

Re: CPF 4-2025-043-NOPV Response to Notice of Probable Violation and Proposed Compliance Order

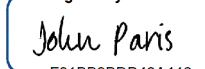
Dear Mr. Lethcoe,

Holly Energy Partners, LP (HEP) appreciates the Pipeline and Hazardous Materials Safety Administration's review and the opportunity to respond to the Notice of Probable Violation and Proposed Compliance Order (Notice) issued on November 25, 2025. On December 22, the Southwest Region granted HEP an extension to January 24, 2026, to respond to the Notice, and the Company appreciates the accommodation.

After careful review of the Notice, HEP does not contest the allegations associated with Items 1, 2, and 3, nor does it contest the proposed Compliance Order for Item 1. With respect to Items 2 and 3, HEP is evaluating abandonment of the subject pipeline segment and respectfully requests an informal conference to discuss potential modifications to the proposed compliance actions for those items.

Additionally, in order to preserve its rights, HEP also respectfully submits a Request for Hearing and a Preliminary Statement of Issues pursuant to § 191.211. HEP hopes that a hearing will be unnecessary, and this matter can be resolved informally. HEP remains committed to compliance with all pipeline safety regulations and continues to value our collaborative relationship with PHMSA.

Sincerely,
Signed by:


F81BB9BDD49A446...
John Paris

Vice President, Midstream Operations

cc: Elnora Winn (PHMSA); Terri Binns (PHMSA); Timothy O'Shea (PHMSA); Charles Curl (HF Sinclair); James Wilds (HF Sinclair)

Holly Energy Partners, Operating L.P.
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**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. 4-2025-043-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 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 proposed compliance order in the NOPV. At the hearing, HEP intends to raise the following issues:

Item 2-49 C.F.R. § 195.452(a)

A. Whether the proposed compliance order is appropriate or should be modified or withdrawn.

Item 3-49 C.F.R. § 195.583(c)

A. Whether the proposed compliance order is appropriate or should be modified or withdrawn.

Respectfully submitted this 23 day of January
2026.

Signed by:

John Paris

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