



Hilcorp Alaska, LLC

Cynthia S. Monnin, PE
Director – Integrity
Hilcorp Alaska, LLC
cmonnin@hilcorp.com
Phone: 907-777-8433

December 21, 2023

Via E-mail to Dustin.Hubbard@dot.gov

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
1230 W. Dakota Ave., Suite 110
Lakewood, CO 80228

**RE: CPF No. 5-2023-063-NOA
Hilcorp Alaska, LLC
Request for Informal Conference
Request for Hearing and Preliminary Statement of Issues**

Dear Mr. Hubbard,

As described in the attached, Hilcorp Alaska, LLC (Hilcorp) respectfully requests an informal conference to attempt to resolve the above-referenced Notice of Amendment (NOA) issued on December 19, 2023.

To preserve its rights, Hilcorp Alaska also submits the attached Request for Hearing, a request to defer the Hearing, and a Preliminary Statement of Issues. Hilcorp Alaska hopes that that hearing will be unnecessary, and that the parties can resolve this matter informally.

We will reach out to you regarding scheduling an informal conference. In the meantime, please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'C S Monnin'.

Cindy Monnin P.E.
Director of Integrity - Alaska
Hilcorp Alaska, LLC

Cc: Kathleen Maitland (PHMSA)
Alexandra Iorio (PHMSA)
Gabrielle St. Pierre (PHMSA)
Denali Kempffel (General Counsel, Hilcorp Alaska, LLC)

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

**In the Matter of
Hilcorp Alaska, LLC,

Respondent.**

CPF No. 5-2023-063-NOA

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

I. Request for Informal Conference

Pursuant to 49 U.S.C. § 60117(b)(1)(B), Hilcorp Alaska, LLC (Hilcorp Alaska, or the Company) respectfully requests an informal conference to discuss settlement of the above-referenced Notice of Amendment (NOA). Hilcorp Alaska is hopeful that through further discussion of the relevant facts and circumstances this allegation can be resolved without a hearing.

II. Request for Hearing and Deferral

Pursuant to 49 C.F.R. § 190.211(b), Hilcorp Alaska respectfully requests an in-person hearing to contest the allegation in the above-referenced NOA. Hilcorp Alaska requests this hearing be deferred while the parties continue to engage in discussion to resolve the complex jurisdictional issues raised in the NOA. If a hearing is held, Hilcorp Alaska will be represented by counsel at the hearing.

III. Preliminary Statement of Issues

At the hearing, Hilcorp Alaska intends to raise the following issues:

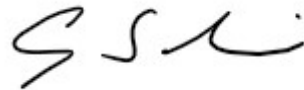
1. Whether the Company's practices and procedures for making jurisdictional and regulatory determinations are inadequate.
2. The appropriate jurisdictional and regulatory status of the pipeline assets in question.

Hilcorp Alaska reserves the right to supplement this preliminary statement of issues in

response to any additional information or arguments from PHMSA.

Respectfully submitted this 21st day of December 2023.

Hilcorp Alaska, LLC

A handwritten signature in black ink, appearing to read 'C. Monnin'.

Cindy Monnin, P.E.
Director of Integrity - Alaska
Hilcorp Alaska, LLC