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April 8, 2014

VIA E-FILING

The Honorable Daniel R. Elliott, Chairman
The Honorable Ann D. Begeman, Vice Chairman
United States Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

ENTERED
Office of Proceedings
April 8, 2014
Part of
Public Record

Re: STB Docket No. EP 724
United States Rail Service Issues
Comments of PBF Holding Company LLC

Dear Chairman Elliott and Vice Chairman Begeman:

By Notice served April 1, 2014, the Board scheduled a public hearing to discuss service issues in the United States, particularly those issues faced by shippers being served by Canadian Pacific Railway Company ("CP") and BNSF Railway Company ("BNSF"), and those whose products ship through the Chicago area.

PBF Holding Company LLC ("PBF") is one of the largest independent petroleum refiners and suppliers of unbranded transportation fuels, heating oil, petrochemical feedstocks, lubricants and other petroleum products in the United States. In particular, PBF currently owns and operates three domestic oil refineries and related assets located in Ohio, Delaware and New Jersey. PBF relies on rail transportation for the delivery of crude oil and other products to its refineries as well as the disposition of certain hydrocarbon products produced. Much of the crude oil that is run in PBF's refineries is handled by BNSF or CP from load point to the Chicago gateway.

PBF is not requesting time to testify at the hearing; however, it is filing this letter to make the Board aware of the service issues it has been experiencing.

PBF ships approximately 70,000 carloads per year of crude oil, petroleum products and petrochemicals by rail. It relies on consistent service and ratable deliveries to sustain its business. While the service problems this winter and spring have affected PBF as it has many other shippers, PBF believes that the railroads are working to correct the issues and that better weather will help, or at least not impede, those efforts.

Based on the apparent focus of the hearing, and the complaints the Board has evidently been receiving from certain shippers (primarily of agricultural products and coal), PBF is concerned

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that the efforts to resolve the shipments of coal and agricultural products' issues not have the unintended effect of further exacerbating the service issues faced by shippers of other commodities such as crude oil. The reliable and ratable delivery of crude oil to our refineries is necessary in our manufacturing process.

PBF encourages the Board, including but not limited to its Office of Public Assistance, Governmental Affairs and Compliance ("OPAGAC"), to continue to work with the railroads to resolve the service issues shippers such as PBF have been experiencing. The Board should work with the railroads on an across-the-board solution, and should not require or force better service for one commodity to the detriment of service to other commodities.

Thank you for your consideration of our views.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J Fedena", with a long horizontal flourish extending to the right.

James Fedena
Senior Vice President - Logistics