



PLAINS
ALL AMERICAN
PIPELINE, L.P.

Tuesday, August 04, 2015

Internal Revenue Service
CC:PA:LPD:PR (REG-132634-14)
Room 5203
P.O. Box 7604
Ben Franklin Station
Washington, DC 20044

**Re: Comments on the Proposed Regulations, REG-132634-14, of Code Section 7704
Qualifying Income**

Plains All American Pipeline, LP ("PAA", "we", "us", or "our") appreciates the opportunity to submit our comments on the recently issued proposed regulations (REG-132634-14) (the "Proposed Regulations") pertaining to Qualifying Income as defined under Internal Revenue Code ("IRC") Section 7704(d)(1)(E).

PAA is a publicly traded partnership ("MLP"), and we engage in the transportation, storage, terminalling and marketing of crude oil and refined products, as well as in the processing, transportation, fractionation, storage and marketing of natural gas liquids ("NGL"), including ethane, natural gasoline products as well as propane and butane, products which are also commonly referred to as liquefied petroleum gas ("LPG").

PAA is a member of the National Association of Publicly Traded Partnerships ("NAPTP"). We have reviewed the comments that are being submitted by the NAPTP, and we are in support of their submission.

Regards,

Walter van Zanten
VP Tax
Plains All American Pipeline, L.P.

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