

United States of America FEDERAL TRADE COMMISSION WASHINGTON, D.C. 20580

Office of the Secretary

March 4, 2014

Mr. Brian Dale

Dear Mr. Dale:

Thank you for the comment you submitted electronically on February 5, 2014, in connection with Tesoro Corporation's ("Tesoro") Application for Approval of Proposed Divestiture, filed on December 17, 2013. Pursuant to the Decision and Order in Docket No. C-4405, Tesoro requested prior Commission approval of its proposal to divest certain terminal assets in Boise, Idaho to Sinclair Transportation Company ("Sinclair").

Your comment has been placed on the public record and it has been given review. In your comment, you expressed concerns of increasing concentration in the Boise gasoline market. The purpose of the divestiture is to restore competition in the market for "terminaling services" for light petroleum products in the Boise area. Terminal owners compete to provide services such as off-take, storage, and truck-loading to petroleum marketers and other third parties that do not own terminals in a given market. Thus, the relevant market in this instance is not the general gasoline market about which you wrote, but a different, although related, market. The Commission considered whet