



610 West 2nd Street
P.O. Box 20008
Owensboro, KY 42304-0008
270/926-8686

May 22, 2015

Mr. Wayne Lemoj, Director
PHMSA Southern Region
233 Peachtree Street NE, Suite 602
Atlanta, GA 30303

RE: Notice of Probable Violation and Proposed Compliance Order CPF 2-2015-1002

On April 24, 2015, PHMSA issued a Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order ("Notice") to Texas Gas Transmission, LLC ("Texas Gas") for the Fayetteville Lateral in Mississippi and Arkansas. This letter is Texas Gas' 30-day response to the Notice. The Notice contains two items; each item is addressed below.

Regarding item 1, there appears to have been a misunderstanding regarding Texas Gas' assets at the location. PHMSA cited 192.167 (a)(2) for the probable violation as follows:

§192.167 Compressor stations: Emergency shutdown.

- (a) Except for unattended field compressor stations of 1,000 horsepower (746 kilowatts) or less, each compressor station must have an emergency shutdown system that meets the following:
- ... (2) It must discharge gas from the blowdown piping at a location where the gas will not create a hazard.

Section 192.167(2) only applies to natural gas piping. The piping addressed in the Notice was for air not natural gas. Texas Gas utilizes a pressurized air emergency shut-down system for the Bald Knob compressor station. The emergency shut-down station will vent air and thus cause the emergency shut-down system to activate. Therefore, Section 192.167(2) does not apply to this piping, and there is no violation. Texas Gas respectfully requests that a compliance order not be issued for this item. Texas Gas apologizes for any miscommunication that may have occurred during the inspection that impacted the incorrect classification of the piping. Texas Gas recognizes its error in not properly communicating and helping the inspector understand the facilities he was reviewing so that this miscommunication would not occur.

Texas Gas does not contest item 2. Accordingly, Texas Gas will pay the \$36,300 and address remedial actions described in the proposed compliance order for item 2.

If you have any questions or concerns with this response please contact me at (270) 688-6361 or email me at jeff.mcmaine@bwpmlp.com.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey B. McMaine". The signature is written in a cursive style with a large, stylized "J" and "M".

Jeffrey B. McMaine
Manager, Codes and Standards
Boardwalk Pipelines – Texas Gas

RECEIVED MAY 26 2015