

MAR 07 2006



Sue Griffin

*Associate General Counsel and
Assistant Corporate Secretary*

VIA FEDERAL EXPRESS

March 6, 2006

U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

Attn: Stacey L. Gerard
Assistant Administrator, Chief Safety Officer

Re: Final Order – CFP – No.4-2005-1003

Dear Ms. Gerard:

Norteno Pipeline Company (“Norteno”), pursuant to 49 CFR Sec. 190.215, respectfully petitions for a partial reconsideration of the above referenced Final Order. Norteno requests that reconsideration be given to the civil penalty assessed for Item 1B, 49 CFR Sec. 192.491(c), in the amount of Five Thousand dollars (\$5,000).

In Norteno’s March 31, 2005 response, Norteno, at Tab 1, provided an **example only** of its METER/REGULATOR STATION SAFETY INSPECTION REPORTS (“Reports”) associated with one specific location (Lamesa & 5th) for the time period of 2001 – 2005 (emphasis added). This sample time period was selected by Norteno to submit previously as it was the five (5) year time period prior to the 2005 response.

As evidenced by the attached, Norteno has always possessed the required five (5) years of records, including the five (5) year time period prior to the year of the audit, being 2003. Attached for your consideration are copies of the Reports for four (4) additional locations and the Lamesa & 5th location from 1998 to 2005. These five (5) locations represent all Norteno meter/regulator stations which require annual inspections. The example/sample records previously submitted were only provided to indicate that Norteno has no exposed “pipeline or portion of pipelines”, only meter/regulators which are annually inspected for atmospheric corrosion.

Ms. Stacey L. Gerard

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Thank you for your favorable consideration of the enclosed documentation which is being provided to support the explanation provided above. Should you have any questions, or require any additional information, please feel free to contact me.

Regards,

A handwritten signature in black ink that reads "Sue Griffin". The signature is written in a cursive style with a large, prominent "S" and "G".

Sue Griffin

Enclosures

cc: **Greg Phillips**
Mark Montgomery
Shantel Norman
Richard Fleager