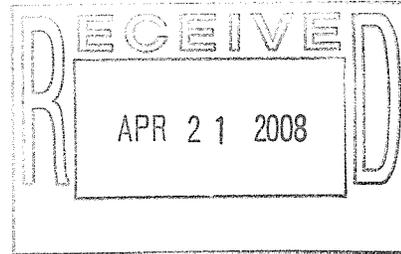




# ONEOK PARTNERS

April 16, 2008

Pipeline and Hazardous Materials Safety Administration  
Southwest Region  
8701 South Gessner, Suite 1110  
Houston, Texas 77074



Attention: Mr. R. M. Seeley  
Director, Southwest Region

Re: Notice of Probable Violation and Proposed Compliance Order  
ONEOK Partners LP, OkTex Pipeline, LLC  
CPF 4-2008-1003

Dear Mr. Seeley:

Pursuant to the Notice of Probable Violation and Proposed Compliance Order CPF 4-2008-1003 dated March 14, 2008, ONEOK Partners, LP (ONEOK), OkTex Pipelines, LLC respectfully submits the following information to address the issues brought forth from the inspection of OkTex Pipeline, Norteno #1, #4 and #5 pipeline systems held during the weeks of September 10-14, September 24-26, and December 6, 2007.

The Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue a Compliance Order incorporating the following remedial requirements to ensure the compliance of ONEOK's Norteno pipeline systems. In response to this Notice, ONEOK accepts the Proposed Compliance Order and provides the following responses to the remedial requirements as stated in the Proposed Compliance Order as follows:

*1. In regard to Item Number 1 of the Notice pertaining the portion of the Norteno #1 pipeline that crosses from El Paso area into the Rio Grande to Mexico, ONEOK must establish the maximum allowable operating pressure of the Norteno #1 pipeline, including the 0.2 mile going into the Rio Grande River, based upon § 192.619 guidelines.*

ONEOK Response:

ONEOK completed a pressure test on a portion of the Norteno #1 pipeline in July, 2007. A pressure test plan was developed for approximately 6,300 feet of 12" pipe which included a review of the existing materials, operating history, test limits, leak

survey requirements, pressure test criteria. The test included the 12" pipe from the take off at El Paso Natural Gas to an existing block valve located just north of the Rio Grande and the Border Highway. This segment of pipeline was hydrostatically tested for eight hours to a pressure of 688 Psig which qualifies this segment to operate at 459 Psig. Documentation for this pressure test is provided herein.

ONEOK shall develop a pressure test plan for the remaining segment of the Norteno #1 pipeline, specifically, the 0.2 mile crossing into the Rio Grande. The test plan will include evaluation of the existing materials, operating history, test limits, leak survey requirements, pressure test criteria and the required documentation of the test to establish the maximum allowable operating pressure based upon § 192.619 requirements.

*2. ONEOK must provide maximum allowable operating pressure documentation for the Norteno Pipelines, Norteno #1, Norteno #4 and Norteno #5 that meet the requirements of § 192.619.*

ONEOK Response:

ONEOK completed pressure tests on the Norteno #4 and Norteno #5 pipeline systems in November, 2007. A pressure test plan was developed for each system, which included a review of the existing materials, operating history, test limits, leak survey requirements, pressure test criteria.

The Norteno #4 pipeline system was tested in two segments. Based on the successful gas pressure tests, the first segment of 6" and 4" is qualified to operate at 252 Psig. The second segment of 4", 3" and 2" was successfully gas pressure tested and is qualified to operate at 104 Psig. The existing Canutillo delivery point provides the required regulation and overpressure protection between the 252 Psig and the 104 Psig systems.

The Norteno #5 pipeline system was tested in one segment. Based on the successful gas pressure tests, this segment of 4" and 3" is qualified to operate at 61 Psig.

Attached as part of this response is the documentation to establish the maximum allowable operating pressures for the Norteno #4 and Norteno #5 pipeline systems. These documents include system maps, report of pipeline pressure test forms, test charts, pressure test logs and leak survey reports.

*3. ONEOK must address the issues detailed in Item 1 above within 90 days after receipt of a Final Order and submit to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration.*

ONEOK Response:

ONEOK shall complete a pressure test for the remaining segment of the Norteno #1 pipeline, specifically, the 0.2 mile crossing below the Rio Grande River. ONEOK

requests that the completion date for conducting the pressure test of this remaining segment of the Norteno #1 facilities be no later than July 31, 2008. The required documentation to establish the maximum allowable operating pressure shall be submitted to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration within 30 days of completion of the pressure test.

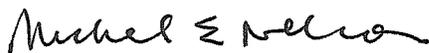
*4. ONEOK shall maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. Costs shall be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total costs associated with replacements, additions and other changes to pipeline infrastructure.*

ONEOK Response:

ONEOK will initiate internal work orders which will track safety improvement costs associated with fulfilling this Compliance Order. ONEOK will report costs specifically for; 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total costs associated with replacements, additions and other changes to pipeline infrastructure. Total costs shall be submitted to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration within 90 days of completion of the pressure testing activities.

Enclosed is an electronic copy of this response and associated documents. If you require any additional information or clarification to this response letter, please contact Michael Jablonske, Manager of Pipeline Integrity at 651-994-0332, extension 1221.

Sincerely,



Mr. Michel Nelson  
Senior Vice President - Natural Gas Pipelines  
ONEOK Partners, L.P.  
100 West Fifth Street  
Tulsa, OK 74103-4298