

February 14, 2014

Mr. Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Ave.
Suite 110
Lakewood, Colorado 80228

**RE: Response to Notice of Probable Violation and Proposed Compliance Order
(CPF 5-2013-1015)**

Dear Mr. Hoidal,

On January 13, 2014, WBI Energy Transmission, Inc. (WBI) was granted an extension of 30 days to reply to the Notice of Probable Violation and Proposed Compliance Order (NOPV) CPF 5-2013-1015.

In CPF 5-2013-1015, PHMSA suggested that WBI committed a probable violation of 49 CFR 192.935. PHMSA stated WBI did not perform an adequate risk analysis to identify additional preventative and mitigative (P&M) measures that should be taken beyond those already required by Part 192 in order to mitigate the consequences of a pipeline failure in a high consequence area. Furthermore, PHMSA stated WBI based the P&M analysis solely on the Gas Research Institute (GRI) *Topical Report 91/0446* and the GRI *Final Report 98/0076* and did not adequately analyze and evaluate the need for remote control valve (RCV) and automatic shut-off valve (ASV) locations to determine if they would mitigate or enhance public safety in each HCA covered segment.

The Proposed Compliance Order directs WBI to conduct an evaluation/risk analysis of its pipelines to determine if ASVs or RCVs would be an efficient means of adding protection to a high consequence area in an event of a gas release to reduce the risk from a ruptured gas pipeline and thus minimizing the consequences of certain gas pipeline ruptures.

As per the Notice of Probable Violation and Proposed Compliance Order, WBI will proceed in reevaluating its pipelines to determine if ASVs or RCVs would be an efficient means of adding protection to all HCAs. WBI continuously strives to achieve the highest level of pipeline safety and will use this reevaluation as an opportunity to improve our Integrity Management Plan. WBI will conduct and complete the described evaluation within 180 days from the issuance of the Final Order by PHMSA.

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,



Scott Fradenburgh
Vice President of Operations
WBI Energy Transmission, Inc.

Via E-mail and Certified U.S. Mail