



Targa Midstream Services LP
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July 2, 2007

R.M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials
Safety Administration ("PHMSA")
8701 S Gessner, Suite 1110
Houston, TX 77074

1000 3/2007
BY:

Reference: CFP 4-2007-2002

Dear Mr. Seeley:

We are in receipt of your letter dated June 4, 2007, concerning the inspection of Targa Midstream Services Limited Partnership's ("Targa") Seahawk and Pelican Pipelines in Lake Arthur, Louisiana on July 10-14, 2006 ("Audit"). We appreciate the opportunity to provide further details regarding the PHMSA's concerns and the potential violations noted during the Audit.

Item Number 1 – 192.225 Welding Procedures

Targa's procedures require welders to use qualified procedures. Although the procedure used in this repair was not recorded in the repair records, for future welding Targa will require identification of the welding procedure used and verification that the procedure used was a qualified procedure.

Item Number 2 - 192.229 Limitation on Welders

Targa procedures require the welder to have used the process within the preceding six (6) months or be re-qualified to use the procedure. Repair records of the West Cameron 118 riser repair did not document the welder's then-current qualifications, at the time of the repair. Targa will endeavor to document that welding is completed by qualified welders in its repair records.

Item Number – 192.243 Nondestructive testing.

Targa procedures include written procedures for non-destructive testing. Although documentation of the nondestructive testing ("NDT") procedure used was not included in the repair report for the West Cameron 118 riser, Targa will endeavor to include the documentation of the NDT testing procedure used in future repairs to the pipeline.

Item Number 4 – 192.477 Internal Corrosion Control: Monitoring

Targa was able to obtain all records of internal corrosion coupon monitoring for the period cited except for the coupon that was installed on June 16, 2005 and removed on December 13, 2005 ("June 2005 Coupon"). The records of coupon analysis are attached for your review as Attachment A.

Upon information and belief, the June 2005 Coupon records were inadvertently lost when a review and update of the filing system was completed, prior to the date of the Audit.

While Targa was unable to provide the majority of its records on this subject at the time of the Audit, the records attached hereto do confirm that the required monitoring was performed. Targa asks that the PHMSA consider lowering its proposed penalty amount in light of the fact that the potential violation noted in the Audit is really a recordkeeping management error, rather than a failure to complete all of the required monitoring.

Item Number 5 – 192.739 Pressure limiting and regulating stations: Inspection and testing

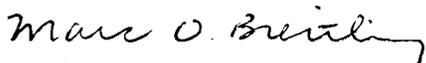
Relief valves PSV 101A and 101B are mounted on a pressure vessel at the Pelican Separation Facility. These valves are not relied upon to provide primary overpressure protection for the pipeline. Offshore overpressure shutdowns are the primary protection for the pipeline.

Inspection and testing of these relief valves were provided by the personnel who operate the Pelican Separation Facility. Targa will assure that its pipeline personnel test and inspect these valves every calendar year not to exceed fifteen (15) months, in accordance with Pipeline Safety Rule 192.739, and that such personnel document such efforts.

Targa appreciates the PHMSA's consideration of its responses to the potential violations noted during the Audit. If you have any questions, please contact Tim Huffer, Manager Regulatory Compliance, at 337-583-4642.

Sincerely,

Targa Midstream Services Limited Partnership,
Operator of the Seahawk and Pelican Pipelines



Marc O. Breitling
Vice President
Targa Midstream Resources

Analytical Laboratory Report for:
TARGA MIDSTREAM SERVICES



Chemical Services

Account Representative:
Little, Keith

Coupon Analysis

Samples were submitted to our laboratory from **Barracuda/Stingray** for the following analysis.

Lab Test Number	Location	Coupon Number	Coupon Installed	Coupon Removed	mpy
2006205705	12" Seahawk	D795	12/13/2005	05/23/2006	0.02

Analytical Laboratory Report for:
TARGA RESOURCES, INC.



Chemical Services

Account Representative:
Little, Keith

Coupon Analysis

Samples were submitted to our laboratory from **BARRACUDA/STINGRAY** for the following analysis.

Lab Test Number	Location	Coupon Number	Coupon Installed	Coupon Removed	mpy
2005207705	12" Seahawk	D792	11/30/2004	06/16/2005	0.01

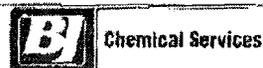
Analytical Laboratory Report for: TARGA RESOURCES, INC.	 Chemical Services
UNICHEM Representative: Little, Keith	

Coupon Analysis

Samples were submitted to our laboratory from **BARRACUDA/STINGRAY** for the following analysis.

Lab Test Number	Location	Coupon Number	Coupon Installed	Coupon Removed	mpy
2004210235	12" Seahawk	D749	05/12/2004	11/30/2004	0.07

Analytical
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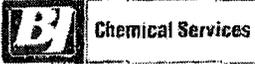


UNICHEM Representative: Keith Little

Coupon Analysis

Samples were submitted to our laboratory from Lowery Gas Plant for the following analysis.

Lab Test Number	Location	Coupon Number	Coupon Installed	Coupon Removed	mpy
2004204774	12 in. Seahawk	D752	12/03/2003	05/12/2004	0.12

Analytical Laboratory Report for: Dynege	
	UNICHEM Representative: Keith Little

Coupon Analysis

Samples were submitted to our laboratory from Lowery Gas Plant for the following analysis.

Lab Test Number	Location	Coupon Number	Coupon Installed	Coupon Removed	mpy
2004200060	12 in. Seahawk	A8228	06/09/2003	12/03/2003	0.09

Analytical Laboratory Report for: Dynege	 Chemical Services
UNICHEM Representative: Keith Little	

Coupon Analysis

Samples were submitted to our laboratory from **Lowery Gas Plant** for the following analysis.

Lab Test Number	Location	Coupon Number	Coupon Installed	Coupon Removed	mpy
2003202913	12 in. Seahawk	D750	12/18/2002	06/09/2003	0.14