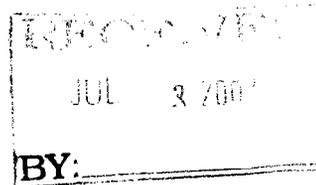




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July 2, 2007

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



Reference: CFP 4-2007-2003M

Dear Mr Seeley:

We are in receipt of your letter dated June 4, 2007 ("June 4 Letter"), 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. We are submitting the attached revised procedures to address the apparent inadequacies noted in the June 4 Letter.

The following attachments reflect the revisions to the items listed in the June 4 Letter.

1. 192.491 Corrosion Control Records

Page 8 of Section X of the OM&E Manual – 8.Records has been revised to clarify and reinforce that Targa will retain corrosion records for at least five (5) years and records related to §192.465(A) and (E) and §192.475(B) for so long as the relevant pipeline remains in service.

2. 192.709 Transmission lines: Record Keeping

Page 7 of Section IX of the OM&E manual – 11.Records has been revised to clarify and reinforce that Targa will retain records of a repair made to parts of the pipeline system other than pipe for at least five (5) years.

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

A handwritten signature in cursive script that reads 'Marc O. Breitling'.

Marc O. Breitling
Vice President
Targa Midstream Resources

7. Electrical Isolation

The effectiveness of insulation flanges or other devices will be checked at intervals not to exceed 15 months but at least once each calendar year. These readings shall be included in the annual cathodic protection survey report. Insulating devices shall be installed at

1. Points of ownership change
2. At gas plants
3. Electrical conduit connections to the pipeline
4. Stainless steel tubing connections to the pipeline.
5. Pipe supports
6. Cased crossings

(Appendix W and X)

Requirements

- a. Insulating devices will be installed on sections of the pipeline where electrical isolations are necessary to facilitate the application of corrosion control. Insulating devices will be inspected and electrically tested upon installation and annually. If the difference in potential between the pipeline and the other metallic structure is above 100 MV, isolation is adequate. If questionable readings are found, an insulator checking device will be used to determine adequate insulation.
- b. If isolation of the pipeline from other metallic structures is not possible, the pipeline and the other metallic structure will be electrically interconnected and cathodically protected as a single unit.
- c. If insulating devices are installed in an area where a combustible atmosphere is reasonable to foresee, a ground cell will be installed across the insulating device to prevent arcing.
- d. If a portion of the pipeline is in close proximity to electrical transmission tower, ground cables, or counterpoise, or in other areas where it is reasonable to foresee fault currents or an unusual risk of lighting, protective measures at insulating devices will be taken. AC test will be completed on pipeline segments near electrical transmission towers. Zinc Anode beds or Kirk Cells will be installed if fault currents are discovered.

8. Records

External and internal corrosion control records shall be maintained on maps, reports, and/or computer files to show the location and history of the cathodic protection system. One set of records shall be kept at the pipeline office. Contractors or other third parties generating corrosion control records for Targa pipelines shall provide records to Targa agents. Original records are preferred.

Each record or map shall be retained as long as the pipeline remains in service. Records of tests, surveys, or inspections required to demonstrate adequacy of corrosion control measures or that a corrosive condition does not exist shall be kept for 5 years, except that records related to 192.405(a) (CP potentials), 192.405(e) (reevaluation of unprotected pipe) 192.475(b) (inspection of internal surface) must be retained for as long as the pipeline remains in service.

Revised 7/2/07

**Targa Midstream Services, Limited Partnership
Gas Pipeline Operations, Maintenance & Emergencies Manual
Repairs, Welding, Hot Taps & Non-Destructive Testing Section IX**

8. Testing of Repairs Made By Welding

Acceptable nondestructive inspection methods include visual, magnetic particle, dye penetrate, ultrasonics, and radiography. Non destructive testing cannot be completed underwater. Each repair made by welding must be examined in accordance with paragraph 192.241.

9. Repair Procedures

- a. Expose by excavation only enough pipe to examine the damage. Caution should be taken not to move the pipeline or permit excessive sagging of the piping. Remove coating for inspection. Trace out the exact location and path of any proposed weld and determine the wall thickness by ultrasonic measurement to ensure adequate wall thickness is present for welding.
- b. Just prior to beginning any welding on the pipeline, notify the pipeline operator that work is about to commence. The pipeline pressure shall be maintained at the proper pressure if the welding is to be done on a pressurized line.
- c. Using an exposer, sniff to determine that area is vapor free.
- d. Verify qualified welders using qualified welding procedures and techniques perform welding.
- e. All replacement pipe must be hydrotested prior to installation. Also, one hundred percent of all repair and tie-in welds must be nondestructively tested. The company shall have the right to accept or reject any weld meeting the requirements of the method by which they were inspected.
- f. Where repairs are made to a coated pipe, all damaged coating shall be removed and new coating applied. Replacement pieces of pipe, welded patches, and full encirclement welded split sleeves used in making repairs shall also be coated when installed in a coated line.
- g. The final inspection will include all data and measurements to prepare a report of the repair on "Pipeline Repair/Modification Summary" or similar form.

10. Repair By Replacement

- a. When cutting out a segment from a line the entire line is purged with nitrogen or water.
- b. The pipe to be replaced shall be cut by use of mechanical pipe cutters (no sparking allowed). The section of pipe cut out must not be shorter than one-half diameter.

11. Records

Records of each repair, non-destructive test and pressure test must be made and filed. The welding inspector shall insure a copy of records are filed in project books. The file is to be maintained for the useful life of the line.

Records of a repair made to parts of the pipeline system other than pipe shall be retained for 5 years.

Revised 7/2/07