



August 7, 2009

Mr. R. M. Seeley, Director  
U.S. Department of Transportation  
Pipeline and Hazardous Materials  
Safety Administration  
8701 South Gessner, Suite 1110  
Houston, Texas 77074

RE: Notice of Probable Violation (CPF 4-2009-1018)

This letter is in response to your most recent July 6, 2009 notice of probable violation and proposed compliance order. Please find the information and documentation enclosed representing the corrective actions taken to meet the proposed compliance order referenced above.

**No. 1**  
**Transmission Line Valves**

The valve and operating device to open or close each valve along the pipeline is now protected from tampering and damage. Locks, barricades and/or fences have been added where needed.

Womble Tap Valve:	Pipe barricade installed.
Brewster Check Station:	Additional pipe barricade installed.
Perico Regulator Station:	Chain Link Fence around entire station - Locked
Carter Block Valve:	Pipe barricade installed
El Paso Check Station:	Chain Link Fence around entire station – Locked
Kitchens Block Valve	Cement valve box and lid - Locked

(Please see enclosed pictures for each station)

**No. 2**

**Atmospheric corrosion control: General**

Corrective action has been taken to eliminate active corrosion at the pipe supports at several locations listed below: Pipe at support area has been cleaned recoated and insulation material added between pipe and support. See pictures enclosed that represent the corrections made.

Valley Farms mainline valve  
Brewster meter station  
Perico regulator station

**No. 3**

**Vault Maintenance**

Locking device at the "Kitchens Valve Box" has been locked to prevent unauthorized access. (See picture enclosed)

**No. 4**

**External corrosion control: Electrical Isolation.**

Cased road crossings at the listed sites below have been excavated, test leads/stations have been installed and readings have been recorded and records are now available for future review and monitoring. (See corresponding pictures enclosed)

Cased Road Crossings:        PNM tap – picture #12  
   Felt tap - picture #11  
   Highway 56 crossing – picture # 5  
   El Paso crossing – picture # 1

**No. 5**

**Atmospheric Corrosion Control: Monitoring**

Atmospheric corrosion inspections have been completed on the entire pipeline. Records are now available for review. Deficiencies noted on the last atmospheric survey (see report enclosed) have been corrected. The stations inspected include:

Valley Farms meter station  
Womble Tap  
Mainline Valve assembly  
Brewster Check Meter  
Perico regulator station  
Carter Block Valve  
El Paso Check station  
Kitchens block valve  
Byrd block valve  
Rehm block valve

**No. 6**

**Transmission Lines: Patrolling**

Patrolling of the pipeline - observing surface conditions, indication of leaks, construction activity and other factors affecting safety and operations on and along the transmission line right-of-way is routinely performed as required. We failed to complete the necessary reports to document this activity. This reporting has been completed and measures have been taken to assure documentation will be on file in the future. (See most recent patrol records enclosed)

Areas patrolled include:

PNM Tap

Felt tap

Highway 56 road crossing

**No.7**

**Completion of Corrections within 60 day of Final Order**

All violations have been corrected and completed within the required 60 days.

**No. 8**

**Documentation maintenance of Safety improvements**

WTG has records and documentation of the improvements associated with fulfilling this Compliance Order. (The total cost for these associated cost are enclosed)

Please call if you have any questions. (806) 358-1321

Sincerely,



Bart Bean  
Operations Manager  
West Texas Gas, Inc.  
7517 Canyon Drive  
Amarillo, Texas 79110

Attachments:

# 12  
411 NEW MEXICO



# 11

TEST STATIONS

US. 56 NEW MEXICO



# 5 Hwy 56



# 1 FM 2202





WOMBLE



BREWSTER



BREWSTER



PERICO STATION



**WARNING GAS PIPELINE  
WEST TEXAS GAS, INC.  
PERICO STATION**



**DALHART, TEXAS  
BEFORE EXCAVATING OR  
IN CASE OF EMERGENCY CALL:  
(806) 244-4513**



CARTER



EL PASO STATION #1



WARNING GAS PIPELINE  
WEST TEXAS GAS, INC.  
WTG STATION #1  
WTG  
DALHART, TEXAS  
BEFORE EXCAVATING OR  
IN CASE OF EMERGENCY CALL:  
(806) 244-4513

VALLEY FARMERS



VALLEY FARMERS



VALLEY FARMERS



BR EWSTER





PERICS STATION



PERICO STATION



KITCHENS VALVE BOX





ATMOSPHERIC CORROSION SURVEY



Western Gas Interstate

DISTRICT DALHART SYSTEM MAINLINE TRC/CC Unit 111215

INSPECTION CHECKLIST

Check Off

- 1. Examine exposed piping for atmospheric corrosion.   
Corrosion Found? Yes No
- 2. Examine transition coating or tape for bonding and integrity
- 3. Examine support structures for atmospheric corrosion and mechanical integrity
- 4. Report remedial actions required (if any) to supervisor

List by location all areas with Atmospheric Corrosion requirement of Part 192.485 A & B

Action taken when Atmospheric Corrosion is Present (use GPS):

*Found minor paint corrosion at Corizzo setting  
Found no insulation between pipeline supports and pipe  
at the Valley Farms, Brewster, and Perico settings*

NAME OF INSPECTOR Jerry Delano DATE 1-9-09  
REVIEWING SUPERVISOR Johnny McWhiter DATE 1/12/09

Mainline Crossings  
& Pipeline Patrols  
12" & 22"

Date 1-16-09

- #1 Elpaso on F.M. 2202 -1.525 -1.272
- #2 West on Co. Rd. X
- #3 722 East of Middlewell
- #4 North of Middlewell on Middlewell Rd.
- #5 Highway 87 Nix Fertilizer Tanks -1.873 -1.004
- #6 Wilcon
- #7 East Rehm
- #8 F.M. 297 & Noble Rd. -1.342 -1.312
- #9 Highway 54
- #10 Valley Farmers
- #11 U.S. 56 New Mexico -1.491 -1.061
- #12 411 New Mexico -1.370 -1.846

Comments \_\_\_\_\_

Signature *[Handwritten Signature]*

Supervisor Signature *JM* 1-25-09

Mainline Crossings  
& Pipeline Patrols  
12" & 22"

Date 6-11-09

<u>✓</u> #1	Elpaso on F.M. 2202	<u>-534</u> <u>-1,286</u>
<u>✓</u> #2	West on Co. Rd. X	
<u>✓</u> #3	722 East of Middlewell	
<u>✓</u> #4	North of Middlewell on Middlewell Rd.	
<u>✓</u> #5	Highway 87 Nix Fertilizer Tanks	<u>-876</u> <u>-932</u>
<u>✓</u> #6	Wilcon	
<u>✓</u> #7	East Rehm	
<u>✓</u> #8	F.M. 297 & Noble Rd.	<u>-331</u> <u>-284</u>
<u>✓</u> #9	Highway 54	
<u>✓</u> #10	Valley Farmers	
<u>✓</u> #11	U.S. 56 New Mexico	<u>-480</u> <u>-1,037</u>
<u>✓</u> #12	411 New Mexico	<u>-377</u> <u>-820</u>

Comments Pipeline patrol incomplete due to  
corn circles.

Signature [Signature]

Supervisor Signature JM 6/19/09

**Bart Bean**

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**From:** Derrell [dlansford@xit.net]  
**Sent:** Wednesday, September 02, 2009 5:05 PM  
**To:** 'Bart Bean'  
**Cc:** 'Donny McWhirter'  
**Subject:** DOT Cost of Repairs

Bart, in reference to our phone conversation this morning. Estimate of cost to get in compliance after the audit are as follows.

Build and install railed fence around several locations. Labor and materials.....	5330.00
New signs at several locations.....	300.00
Install test stations, and paint at several locations.....	3500.00
	<hr/>
	TOTAL \$ 9130.00

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Version: 8.5.409 / Virus Database: 270.13.75/2341 - Release Date: 09/02/09 05:50:00