



ONEOK PARTNERS

July 14, 2010

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 Civil Penalty
OkTex Pipeline Company, L.L.C.
CPF 4-2010-1003

Dear Mr. Seeley:

Pursuant to the Notice of Probable Violation and Proposed Civil Penalty CPF 4-2010-1003 dated June 16, 2010, OkTex Pipeline Company, L.L.C. (OkTex) respectfully submits the following response to the issues brought forth from the inspection of OkTex Oklahoma / Texas state border pipeline assets held April 26-30, 2010.

The Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Probable Violation for the following two items with a preliminary assessed civil penalty and warning as listed below.

1. *192.745 Valve maintenance: Transmission lines.*
 - a) *Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.*

During the records review, the PHMSA representative reviewed valve maintenance records that indicated that the valve operation that is required annually on the OkTex 9 and OkTex 10 lines did not occur in 2006. While the valve inspections were performed within the maximum 15 month inspection interval, they were not performed during the calendar year of 2006. As a result, OkTex failed to inspect 12 valves at least once each calendar year on OkTex 9 and OkTex pipelines in 2006.

Proposed Civil Penalty: \$16,200

2. *192.705 Transmission lines: Patrolling.*
 - a) *Each operator shall have a patrol program to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.*

- b) *The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in the following table:*

<i>Maximum interval between patrols</i>		
<i>Class location of line</i>	<i>At highway and railroad crossings</i>	<i>At all other places</i>
<i>1, 2</i>	<i>7 ½ months; but at least twice each year</i>	<i>15 months; but at least once each year</i>

During the records review, the PHMSA representative observed that the patrol of OkTex 4 exceeded the maximum 15 month interval between the 2006 and 2007 calendar year inspections. A patrol of OkTex 4 was conducted on April 5, 2006, and the next patrol took place on August 7, 2007 which exceeded the 15 month maximum interval for patrols of Class 1 locations at all places other than highways and railroad crossings.

Warning Item: PHMSA has reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time.

OkTex Response:

The OkTex assets that were included in this inspection underwent a change of operator during 2006 from Oklahoma Natural Gas Company to ONEOK Gas Transportation, L.L.C. The subsequent transfer of asset records did take place but the required valve testing and patrolling was not conducted within the appropriate time frames.

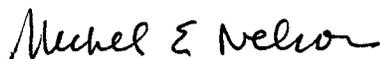
The valve inspections and patrolling since 2006 have been conducted in a timely fashion and within the appropriate time frames. No further gaps in inspection or patrolling have occurred since ONEOK Gas Transportation, L.L.C. has taken over as the operator of these OkTex pipeline assets.

A computer maintenance management system is currently being implemented to schedule and record required maintenance activities for all ONEOK Partners L.P. assets including the OkTex assets. This will help ensure all required pipeline maintenance tasks, including valve maintenance and patrolling tasks, will be completed within their proper time frames. The anticipated completion date for this initiative for our Oklahoma assets is late 2010.

There will be no further documentation filed with PHMSA in response to this Notice of Probable Violation and Proposed Civil Penalty CPF 4-2010-1003 dated June 16, 2010.

If you require any additional information or clarification to this response letter, please contact Patti Ford, Senior Pipeline Safety Engineer, at (918) 588-7131.

Sincerely,



Mr. Michel E. Nelson
Senior Vice President