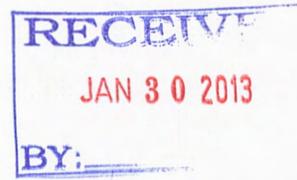


January 29, 2013

Mr. R.M. Seeley
Director, Southwest Region
PHMSA
8701 South Gessner, Suite 1110
Houston, TX 77074



Reference CPF 4-2013-5001

Dear Mr. Seeley:

Targa Resources Operating LP (Targa) received your letter dated January 2, 2013 containing a Notice of two probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations and the Proposed Compliance Order in regards to Item Number 1 of the Notice.

Targa maintains that the company did not violate ¶195.403(b)(1) or ¶195.403(c) listed as Item Number 1 of the Notice. Targa is submitting this written response and enclosed documentation to seek elimination of both the proposed civil penalty and the Proposed Compliance Order in regards Item Number 1.

Your letter states that at the time of the inspection, Targa Resources Operating LP (Targa) failed to provide records indicating the company reviewed the emergency response program with Targa personnel as per the requirements of ¶195.403(b)(1). The letter continues on to state that the last review was performed during February and June of 2010, and that Targa failed to provide records indicating the company reviewed the emergency response program with Controllers at Hackberry Storage Facility.

Targa does not use a "review of the emergency response program" to fulfill the requirements of 195.403(b)(1). Targa uses Annual Personnel Performance Reviews to meet the requirement of ¶195.403(b)(1). Every Targa employee's annual work performance is evaluated and the evaluation documented by their direct supervisor. The communication of the evaluation is completed in a meeting between the supervisor and the person whose performance is being evaluated. A rating of that person's job knowledge is a requirement of the evaluation process.

Using the evaluation as the method of reviewing with personnel their performance in meeting the objects of the emergency program is included in the procedure titled "Personnel Performance Review – Effectiveness of Procedures and Training." The procedure states that the performance reviews will also be used to review with personnel any deficiencies in their performance in meeting the objectives of the emergency response training.

We are enclosing copies of four Performance Appraisals completed in 2011 and 2012 for pipeline personnel as examples of completed Personnel Performance Reviews. Since the Performance Appraisals are considered confidential information by Targa, we request that they not be released under the Freedom of Information Act.

Your letter states that Targa also failed to require and verify that its supervisors maintain a thorough knowledge of emergency response procedures as per section 403(c) in the calendar year of 2011. Your letter continues to say that the last documentation for supervisory training was dated as 6/20/2010 for Emergency Response and 9/9/2009 for Incident Command.

Targa maintains that the company does require and verify that supervisors maintain a thorough knowledge of that portion of the procedures for which they are responsible by completion of the Annual

Personnel Performance Review. A supervisor's annual performance and job knowledge is evaluated and reviewed by the Area Manager. The Job Knowledge section of the Performance Appraisal form requires a rating based on how a person demonstrates a complete understanding of essential functions and duties within the scope of the position.

Enclosed as documentation that performance reviews are completed are reviews completed in 2011 and 2012 for a Pipeline Supervisor. Since the Performance Appraisals are considered confidential information by Targa, we request that they not be released under the Freedom of Information Act.

I can be reached at (337) 583-4642 ext 200.

Respectfully,

A handwritten signature in cursive script, appearing to read "Tim Huffer".

Tim Huffer
Manager, Regulatory Compliance

cc
John Boyette
Hunter Battle

Enclosure