



By Email Only

December 14, 2021

Ms. Mary McDaniel
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 6330
Houston, TX 77074

**Re: Gulf South Pipeline Company, LLC, CPF No. 4-2021-015-NOPV
Written Response to Notice of Probable Violation, Proposed Civil Penalty,
and Proposed Compliance Order**

Dear Ms. McDaniel,

Pursuant to 49 C.F.R. § 190.208, Gulf South Pipeline Company, LLC (Gulf South) respectfully submits its Written Response to the Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order (Notice) issued on November 2, 2021, regarding the Willis Lateral Pipeline. PHMSA approved an extension of time to respond to the Notice by email on November 18, 2021. The extension set a new deadline of December 15, 2021. Therefore, this response is timely.

As explained in the Written Response, Gulf South contests Item 3 and Item 4 of the Notice and request that PHMSA withdraw the alleged violations and the proposed civil penalty and proposed compliance order. Gulf South is not contesting Item 1 and Item 2 of the Notice.

Gulf South requests that it be provided a copy of any further documents or communications from OPS pertaining to the case, including the Region Director's "written evaluation of response material submitted by the respondent and recommendation for final action, if one is prepared." 49 C.F.R. § 190.209(b)(7). Under section 190.209(a), the case file is to be made available to the respondent and the Region Director's written evaluation and recommendation is part of the case file. *Id.*

Gulf South also requests that it be provided an opportunity to submit a response to the Region Director's written evaluation and recommendation.

Thank you for your attention on this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tony G. Rizk". The signature is stylized with a large, circular initial "R" and a long, sweeping underline.

Tony G. Rizk, P.E.
Vice President, Technical Services
Boardwalk Pipelines, LP.

Attachment

CC: Elizabeth Nugent, Esq., Attorney Advisor, Office of Chief Counsel, PHMSA