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RECEIVED JAN 17 2014  
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Via email and overnight delivery

January 16, 2014

Mr. Byron Coy, P.E.  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
Mountain View Office Park  
820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628

**RE: Request for Hearing and Preliminary Statement of Issues  
Notice of Probable Violation and Proposed Civil Penalty  
C.P.F. 1-2013-1026**

Dear Mr. Coy:

Dominion Transmission, Inc. (“DTI”) respectfully submits this Request for Hearing and Preliminary Statement of Issues in response to the Notice of Probable Violation and Proposed Civil Penalty (“Notice”) that the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) issued on November 20, 2013, in C.P.F. 1-2013-1026. The Notice alleges that DTI committed two violations of the minimum federal safety standards for gas pipeline facilities in 49 C.F.R. Part 192 and included a proposed civil penalty of \$30,400 for one of those violations. The Notice included a warning item for the second violation.

In order to ensure our full and fair participation at the hearing, DTI again requests that PHMSA provide all of the materials in the case file for C.P.F. 1-2013-1026. That includes any materials relied upon in calculating the proposed civil penalty. DTI reserves the right to supplement its Preliminary Statement of the Issues in the event that PHMSA provides any additional materials for our review.

DTI further requests that correspondence and materials related to this proceeding be provided to the following persons:

Susan Olenchuk, Counsel for Respondent, Van Ness Feldman, LLP, [sam@vnf.com](mailto:sam@vnf.com)  
Keith Coyle, Counsel for Respondent, Van Ness Feldman, LLP, [jbc@vnf.com](mailto:jbc@vnf.com)  
Lois Henry, Senior Counsel, Dominion Resources Services, Inc., [lois.m.henry@dom.com](mailto:lois.m.henry@dom.com)  
James Shafer, Manager, Pipeline Integrity, DTI, [james.m.shafer@dom.com](mailto:james.m.shafer@dom.com)

Please note that DTI received your letter granting its request for an extension of time to respond in this matter on December 17, 2013. As your letter stated that DTI had 30 days from receipt to submit its response, or until January 16, 2014, this response is timely.

DTI looks forward to working with you and your staff to address any concerns you may have with its pipeline operations. Please do not hesitate to contact me if you have any questions.

Respectfully submitted,



Susan A. Olenchuk

CC: Mr. David Hippchen, West Virginia Public Service Commission  
Ms. Kristin Baldwin, Attorney-Advisor, Office of Chief Counsel, PHMSA  
Ms. Lois Henry, Dominion Resources Services, Inc.  
Mr. James Shafer, DTI

**Dominion Transmission, Inc.**  
**Request for Hearing and Preliminary Statement of Issues**  
**Notice of Probable Violation and Proposed Civil Penalty**  
**C.P.F. 1-2013-1026**

Request for Hearing

DTI requests a hearing on the alleged violations and proposed civil penalty contained in the November 20, 2013 Notice that PHMSA issued in this enforcement action. DTI will be represented by counsel at the hearing and intends to raise the issues identified below in its Preliminary Statement of Issues.

In order to ensure our full and fair participation at the hearing, DTI again requests that PHMSA provide all of the materials in the case file for C.P.F. 1-2013-1026. That includes any materials used or relied upon in calculating the proposed civil penalty. DTI also reserves the right to supplement its Preliminary Statement of the Issues if PHMSA provides any additional materials for our review.

Preliminary Statement of Issues

Notice Item 1: 49 C.F.R. § 192.605

- a. Whether DTI complied with its manual of written procedures for conducting operations and maintenance activities.
- b. Whether a civil penalty of \$30,400 is justified given the evidence of record and the civil penalty assessment criteria in 49 U.S.C. § 60122 and 49 C.F.R. § 190.225.