

**Before the
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety**

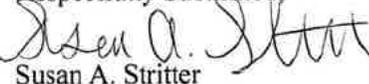
In the Matter of)	
)	
Distrigas of Massachusetts LLC)	CPF No. 1-2018-3004
)	Notice of Probable Violation and
Respondent.)	Proposed Compliance Order
)	
)	REQUEST FOR HEARING

Pursuant to 49 CFR § 190.208, 190.217, and 190.211, Distrigas of Massachusetts, LLC (Distrigas) respectfully requests a hearing in response to the referenced Notice of Probable Violation and Proposed Compliance Order (NOPV and PCO) dated April 20, 2018, issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA). Enclosed is a Statement of Issues raised by the NOPV and PCO. Distrigas will not be represented by counsel at the hearing.

Distrigas is the oldest operating LNG import terminal in the United States. The first shipment of LNG arrived in 1971 predating the applicability of 49 CFR 193. Distrigas has a long-standing, unwavering commitment to safety and fully embraces cooperation with all federal, state, and local regulators to ensure our common goal of safety and compliance is achieved.

Distrigas recognizes that in certain instances the code can give rise to latent ambiguity requiring clarity to address potential differences in interpretation between operators and regulators. Distrigas believes the same is true of the interpretation of Distrigas' procedure that has resulted in the NOPV and PCO addressed herein. Distrigas welcomes the opportunity to have an open dialogue with PHMSA, prior to a hearing, seeking clarity essential to addressing our differences in interpretation of the regulations and in particular, the ESD Loop testing parameters. If clarity can be mutually agreed upon prior to a hearing Distrigas will withdraw its request for a hearing.

In the event an amicable resolution cannot be reached, Distrigas will provide PHMSA with all the material noted in the Statement of Issues at least 10 days in advance of the hearing as required. Distrigas requests that a transcript of the hearing be prepared by a certified court reporter. Distrigas will be pleased to arrange for the transcript, bear the cost, and provide PHMSA and the presiding official a copy of the transcript.

Respectfully Submitted,

Susan A. Stritter
Regulatory Compliance Manger
On behalf of Distrigas of Massachusetts LLC

Dated: 5-17-2018

CC: Robert Wilson, Chief Executive Officer
Jason Austin, VP and General Counsel
Anthony Scaraggi, VP of Operations

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