

December 16, 2019

Mr. Robert Burrough
Director, Eastern Region
U.S Department of Transportation
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road
Suite 300
West Trenton, NJ 08628

RE: CPF-1-2019-1020
NOTICE OF PROBABLE VIOLATION and PROPOSED CIVIL PENALTY

Dear Mr. Burrough:

I hereby submit, on behalf of Greylock Energy and its related affiliates, its formal and timely response to the above referenced Notice of Probable Violation ("NPV") and Civil Penalty. Thank you for the reasonable extension in which to address the same. Please be advised that Greylock Energy is responding to this violation as successor in interest to Energy Corporation of America, which it acquired by transaction on November 29, 2017.

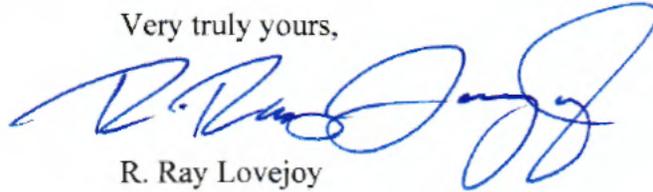
As you are aware, the NPV alleges a probable violation related to Pipeline Safety Regulations, Title 49, CFR § 192.709 Transmission Line: Record Keeping. It specifically addresses § 192.745 (a) during 2017 and 2018. Greylock wishes to contest the allegations with an explanation.

Greylock acknowledges that the Valve Inspection Report does not reflect a checked box in the section for Partially Operated. In that regard, we admit an administrative oversight. However, the oversight is limited to clerical application. The partial operation tests were performed. The area foreman, Roy Ricker, conducted the tests on October 31, 2017 and September 20, 27, and October 1, 2018, respectively. A copy of the reports is attached for your review and consideration. We are willing to provide an affidavit to support this fact, however, as the department is aware, this fact was expressed to PHMSA Federal Inspector, Mr. Steven Giarratano, directly by Mr. Ricker and Mr. Kyle Flanagan via conversation August 20, 2019. Please be advised that measures have been taken to address the matter and the reporting procedure has been amended to fully reflect and memorialize any completed partial operation inspection moving forward.

As such, Greylock requests the Department afford a reasonable leniency. While a full exoneration of the charge is requested, at a minimum, we believe a significant reduction of the civil penalty is warranted. Should the Department mandate a Civil Penalty requirement, we request the opportunity to review the Civil Penalty Worksheet for this case.

Thank you in advance for your attention to this matter and for your anticipated cooperation. Please contact me if I may be of further assistance.

Very truly yours,

A handwritten signature in blue ink, appearing to read "R. Ray Lovejoy", with a large, stylized flourish at the end.

R. Ray Lovejoy