



November 11, 2021

Via E-Mail and Overnight Delivery

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: C.P.F. No. 1-2021-018-NOPV

**Response to Amended Notice of Probable Violation, Proposed
Civil Penalty and Proposed Compliance Order**

Dear Mr. Burrough:

This letter constitutes the formal response of UGI Energy Services, LLC (“UGIES”) to the Amended Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order issued by the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) dated October 14, 2021 (the “Amended NOPV”).

The Amended NOPV alleges three separate violations of PHMSA’s Part 193 regulations in the procedures and records maintained by UGIES at its Temple LNG Plant near Reading, Pennsylvania. Specifically, PHMSA alleged a violation of sections 193.2441(b), 193.2623, and 193.2639(a).

UGIES hereby advises PHMSA that it does not contest any of the alleged violations listed in the Amended NOPV. UGIES will pay the proposed civil penalty and comply with the terms of the Proposed Compliance Order. UGIES is in the process of developing a work plan to establish the capability at its remote gas control center to operate each activated control system and each automatic shutdown system, in accordance with 49 C.F.R §193.2441. UGIES will submit the work plan to PHMSA for review within 30 days of receipt of the Final Order.

Robert Burrough, Director, Eastern Region

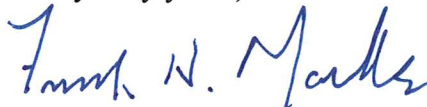
PHMSA

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Please contact Keith Coyle at (202) 853-3460 or me at (610) 768-3625 with any questions or if you wish to discuss this matter further.

Very truly yours,

A handwritten signature in blue ink that reads "Frank H. Markle". The signature is written in a cursive style with a large initial "F" and "M".

Frank H. Markle
Senior Counsel
UGI Corporation

Attorney for UGI Energy Services, LLC

Cc: Erin Hendrixson, Counsel for PHMSA
Keith Coyle, Counsel for UGIES