



3800 Frederica Street
P.O. Box 20008
Owensboro, KY 42304-0008
270/926-8686

February 25, 2011

Mr. Wayne T. Lemoi
Director, Office of Pipeline Safety, PHMSA Southern Region
Office of Pipeline Safety
233 Peachtree Street Ste. 600
Atlanta, Georgia, 30303

Dear Mr. Lemoi

RE: Response to Notice of Probable Violation and Proposed Civil Penalty
CPF No.2-2011-1001

On January 19, 2011 you issued a letter to Texas Gas Transmission, LLC (Texas Gas) outlining a Notice of Probable Violation (NOPV) based on inspections, which were performed by the Southern Region, Office of Pipeline Safety, of Texas Gas facilities and records in Arkansas, Kentucky, Mississippi and Tennessee, pursuant to Chapter 601 of 49 United States Code. In the NOPV, PHMSA alleged that Texas Gas committed probable violations of the Pipeline Safety Regulations in Title 49 of the Code of Federal Regulations, particularly: §192.709, Transmission Lines: Record Keeping; §192.745 Valve Maintenance: Transmission Lines; and §192.465 External Corrosion Control: Monitoring.

Specifically, with respect to §192.709, PHMSA alleged that Texas Gas failed to maintain records for relief valve capacity determinations for calendar year 2008 for its West Greenville District; and that Texas Gas failed to maintain records for valve maintenance requirements along its transmission pipeline for calendar year 2008. With respect to §192.745, PHMSA alleged that Texas Gas did not complete all valve maintenance, inspection, and partial operation requirements within the 15 months allowed by the regulation. With respect to §192.465, PHMSA alleged that Texas Gas' annual cathodic protection pipe-to-soil potential surveys along its Main Line System (MLS) pipeline exceeded 15 months by two days at eight cathodic protection test stations. Texas Gas does not contest these findings.

PHMSA has proposed a penalty of \$9,800 for each of the two violations of §192.709, for a total penalty of \$19,600. PHMSA proposed to waive penalties for the remaining items. Texas Gas does not object to this penalty.

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Texas Gas will make payment by electronic wire transfer February 25, 2011. Should you have any questions or comments, please feel free to contact myself or David Goodwin at (713) 479-8235.

Sincerely,

A handwritten signature in black ink, appearing to read "David Goodwin", written in a cursive style.

David Goodwin

Cc: Walter Bennett

Cc: Jack Adams