



Southern Star Central Gas Pipeline, Inc.  
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P.O. Box 20010  
Owensboro, Kentucky 42301  
Phone 270/852-4410

*Robert S. Bahnick*  
*Senior Vice President*  
*Operations & Technical Support*

January 5, 2008

Mr. Ivan A. Huntoon  
Director, Central Region  
Pipeline and Hazardous Material Safety Administration  
901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

Dear Mr. Huntoon:

Southern Star Central Gas Pipeline, Inc. ("Southern Star") is in receipt of the Notice of Probable Violation and Proposed Compliance Order dated December 12, 2008, wherein your office notes that with respect to Item No. 3, Southern Star must provide a schedule of when odorization will be installed on the lateral mentioned in the Notice. Additionally, the Notice requires that Southern Star conduct an evaluation of the entire Southern Star system to identify all branch lines and mainlines that meet the criteria for odorization outlined in Section 192.625(b).

Following review of the Notice, Southern Star is of the opinion that there is the need for additional clarification if Southern Star is to comply with the Proposed Compliance Order. In order to assure that all parties are following the same guidelines and understand the applicable regulations (192.625) in the same manner, Southern Star respectfully requests a hearing before your office on the specific topic of required odorization standards. At that time, Southern Star will be prepared to discuss in detail its analysis of required odorization on its system and would welcome the input of your office. Nick Hetman, SSCGP Counsel plans to be in attendance at the requested hearing. Please contact David Sinclair if you have questions or concerns.

Sincerely,

Robert S. Bahnick  
Senior VP Operations and Technical Services