



RECEIVED JUL 15 2013

July 12, 2013

Mr. David Barrett
Director, Central Region
Pipeline and Hazardous Materials Safety
Administration
Office of Pipeline Safety
901 Locust Street, Suite 462
Kansas City, Missouri 64106-2641

Via Email: David.Barrett@dot.gov
Via FedEx : 7961 8337 6935

Re: Notice of Probable Violation **CPF 3-2013-5014**
ONEOK NGL Pipeline, L.L.C. and ONEOK Underground Storage Company, L.L.C.
Request for Hearing

Dear Mr. Barrett:

This letter serves a request for a hearing in response to the referenced Notice of Probable Violation dated May 13, 2013, which includes proposed civil penalties and a proposed compliance order (the "NOPV"). By letter dated June 10, 2013, the Pipeline and Hazardous Materials Safety Administration ("PHMSA") granted an extension of time to respond to the NOPV, directing a response on or before July 12, 2013.

ONEOK NGL Pipeline, L.L.C. and ONEOK Underground Storage Company, L.L.C. (collectively, "ONEOK"), pursuant to 49 C.F.R. §§ 190.209 and 190.211, hereby request a hearing on the NOPV. Enclosed herewith please find ONEOK's Statement of Issues which it serves pursuant to 49 CFR § 190.211(a). ONEOK will be represented by the undersigned counsel at the hearing. ONEOK requests that said hearing be held at PHMSA's Central Region office in Kansas City, Missouri.

ONEOK also received on the same day as the NOPV a second Notice of Probable Violation, CPF 3-2013-5015 ("NOPV 5015"). ONEOK requests that the two cases be set for separate hearings and that the hearing for the subject NOPV be scheduled not sooner than 90 days after the hearing for the NOPV 5015 case.

ONEOK further requests that a transcript of the hearing be prepared by a certified court reporter. ONEOK will be pleased to arrange for the transcript and bear the cost of same. ONEOK will provide a copy of said transcript to PHMSA and the Presiding Official.



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MURCHISON
LAW FIRM, PLLC

Mr. David Barrett
July 12, 2013
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Finally, ONEOK hereby requests that PHMSA promptly provide all materials in the case file which are not contained within the Violation Report and accompanying exhibits that were served in conjunction with the NOPV. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'V. Murchison'.

Vince Murchison

cc: Wesley Christensen
Bill Bromley
Vicky Benedict
Tom Kirby



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The Pipeline & Energy Authority

PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, DC 20590

In the matter of:	§	
	§	
ONEOK NGL Pipeline, L.L.C.	§	
and	§	CPF No. 3-2013-5014
ONEOK Underground Storage Company, L.L.C.	§	
	§	
Respondents	§	
	§	

**STATEMENT OF ISSUES
OF
ONEOK NGL PIPELINE, L.L.C.
AND
ONEOK UNDERGROUND STORAGE COMPANY, L.L.C.
TO
NOTICE OF PROBABLE VIOLATION
PROPOSED CIVIL PENALTY
AND
PROPOSED COMPLIANCE ORDER**

ONEOK NGL Pipeline, L.L.C.¹ (“ONEOK NGL Pipeline”) and ONEOK Underground Storage Company, L.L.C. (“ONEOK Storage”; together, “ONEOK”) submit this Statement of Issues in connection with their request for a hearing pursuant to 49 C.F.R. § 190.209 and 49 C.F.R. § 190.211(a).

By letter dated May 13, 2013, the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) served on ONEOK a Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order (collectively, the “NOPV”), CPF No. 3-2013-5014, which was received on that same date. By letter dated June 10, 2013, the Director, Central Region, PHMSA, granted an extension of time to respond to the NOPV and directed that respondents must respond on or before July 12, 2013. By separate writing, ONEOK has requested a hearing in this matter, and this Statement of Issues is served therewith.

BACKGROUND

This matter results from PHMSA’s investigation of a flare incident at a facility known as the “Bushton Facility” located in Bushton, Kansas. The Bushton Facility receives, stores, refines, and dispatches natural gas liquids (“NGLs”). Movement of NGLs into and out of the Bushton

¹ Both ONEOK NGL Pipeline, L.P. and ONEOK NGL Pipeline, L.L.C. are named as respondents in the NOPV. Inasmuch as ONEOK NGL Pipeline, L.L.C. is the successor entity to ONEOK NGL Pipeline, L.P., they are one and the same for purposes hereof; therefore, ONEOK NGL Pipeline, L.L.C. is the party responding.

Facility is by pipeline, though a small portion of outbound propane is loaded to truck transports across a truck loading rack. Each of three affiliated entities owns and/or operates different portions of the Bushton Facility:

- (1) ONEOK Hydrocarbon, L.P. (“ONEOK Hydrocarbon”) owns and operates a refining facility which refines Y-grade NGLs² into various products, primarily ethane, propane, butane, and iso-butane, along with associated storage and in-plant piping, piping manifolds, and other facility components including a drain and flare system;
- (2) ONEOK NGL Pipeline owns and operates inbound and outbound pipelines and the overpressure protection devices that protect those pipelines (collectively, the “Jurisdictional Pipelines”); and
- (3) ONEOK Storage owns a system of underground storage caverns, connected to the refining facilities and the Jurisdictional Pipelines by an in-plant piping system, in which Y-grade and refined NGLs are stored, which storage and in-plant piping system are operated by ONEOK Hydrocarbon.

In the NOPV, PHMSA seeks to find violations of certain of the pipeline safety regulations promulgated at 49 C.F.R. Part 195 (“Part 195”), to impose civil penalties and to order compliance, all pursuant to the procedural and enforcement regulations promulgated at 49 C.F.R. Part 190, Subparts A and B (“Part 190”), as to each and all of which ONEOK NGL Pipeline and ONEOK Storage state their issues.

THE ALLEGED VIOLATIONS

Jurisdictional Issues

As to all matters asserted and alleged by PHMSA with regard to the NOPV, ONEOK disputes and objects to PHMSA’s assertion or presumption of authority to regulate any component of the Bushton Facility, except the Jurisdictional Pipelines, on the following grounds:

1. The Bushton Facility is a refining facility with associated storage and in-plant piping, all of which is excepted from the scope of authority granted to the Secretary of Transportation by the Pipeline Safety Act, 49 U.S.C. § 60101, *et seq.* (“PSA”), 60101(a)(22). Similarly, refining facilities and associated storage and in-plant piping are excepted from regulation under Part 195, 49 C.F.R. § 195.1(b)(8). By virtue of those exceptions, PHMSA lacks authority to regulate any component of the Bushton Facility under the PSA or under Part 195, aside from the Jurisdictional Pipelines, and further lacks authority under the PSA or under Part 190 to find ONEOK in violation of the pipeline safety regulations, to impose penalties or to order compliance.³

² Y-grade is a mixture of demethanized natural gas liquids.

³ ONEOK NGL Pipeline does not dispute or object to PHMSA exercising the proper scope of its authority over the Jurisdictional Pipelines.

2. The interpretation letters upon which PHMSA relies to establish jurisdiction (*see* Exhibit C to the underlying Violation Report) are inconsistent with PHMSA's authority under the PSA and erroneously conclude that PHMSA has authority in excess of that granted by the PSA;⁴ adopt ad hoc definitions of terms not defined in the PSA or Part 195, which definitions were not subjected to notice and comment rule-making; were promulgated without following the requirements of PHMSA's rulemaking regulations at 49 C.F.R. Part 190, Subpart C and the Administrative Procedure Act ("APA"), 5 U.S.C. § 551, et seq.; and reflect a change in PHMSA's interpretation of the PSA but in the absence of reasoned analysis explaining the change.
3. ONEOK disputes and objects to the apparent assertion, and rebuts the apparent presumption, that a Federal Energy Regulatory Commission tariff filing by ONEOK North System, L.L.C. establishes PSA and Part 195 jurisdiction over the Bushton Facility.
4. To the extent PHMSA alleges that ONEOK "admitted" jurisdiction under the PSA or Part 195, ONEOK disputes the allegation and further contends that ONEOK never has admitted or consented to jurisdiction thereunder.
5. ONEOK asserts that an issue exists of whether or not PHMSA failed to name and serve the correct entities that own and operate the facilities that are the subject of the NOPV.

Issues Stated in the Alternative

In the alternative to the foregoing jurisdictional issues, and solely in the event that PHMSA concludes that the Bushton Facility is subject to PHMSA's legal and regulatory authority, ONEOK sets out below its factual, legal and regulatory issues that relate to the allegations of the NOPV. The paragraphs below are numbered to correspond with the numbered Items of the NOPV. Each paragraph begins with the cited regulation and a summary of the allegations.

1. 49 CFR § 195.52 Telephonic notice of certain accidents; by failing to provide timely notice of the flare event.

ONEOK disputes and objects to the allegations stated in the NOPV, in that:

- 1.1. ONEOK NGL Pipeline neither owns nor operates the components of the Bushton Facility which are the subject of this alleged violation;
- 1.2. The NOPV omits to present a statement of the evidence upon which this alleged violation is based;
- 1.3. The subject facility components are not part of a pipeline system or a pipeline facility;
- 1.4. PHMSA has failed to meet its burden of proof that a violation occurred;
- 1.5. Notice was timely;
- 1.6. PHMSA has mischaracterized and misinterpreted agency guidance in place at the time regarding telephonic reporting requirements; and

⁴ PHMSA's Violation Report references and includes the agency's February 28, 2012 and August 8, 2012 letters of interpretation issued to ONEOK NGL Pipeline in PI-11-0012, but does not include the November 28, 2012 letter of interpretation also issued in that docket.

- 1.7. Any such agency guidance in place at the time cannot serve as the basis of a violation.
2. 49 CFR § 195.54 Accident reports; by failing to file a form DOT 7000-1 report of the May 17, 2008 incident.

ONEOK disputes and objects to the allegations stated in the NOPV, in that:

- 2.1. ONEOK NGL Pipeline neither owns nor operates the components of the Bushton Facility which are the subject of this alleged violation;
 - 2.2. The subject facility components are not part of a pipeline system or a pipeline facility;
 - 2.3. PHMSA has failed to meet its burden of proof that a violation occurred;
 - 2.4. Evidence of subsequent remedial measures cannot be used to support a finding of violation, is unduly prejudicial against ONEOK, and must be removed from consideration; and
 - 2.5. To the extent the flare incident is not reportable pursuant to 49 C.F.R. § 195.50, no report is required under the cited regulation.
3. 49 CFR § 195.401(b) General requirements; by failing to correct an unsafe condition which presented an immediate hazard to persons and property prior to resuming operation of the affected part of the pipeline system.

ONEOK disputes and objects to the allegations stated in the NOPV, in that:

- 3.1. ONEOK NGL Pipeline neither owns nor operates the components of the Bushton Facility which are the subject of this alleged violation;
 - 3.2. The NOPV omits to present a statement of the evidence upon which this alleged violation is based;
 - 3.3. The subject facility components are not part of a pipeline system or a pipeline facility;
 - 3.4. The alleged violation is not supported by the evidence in the case file;
 - 3.5. The NOPV fails to make factual findings or to explain, discuss, or analyze the conclusion that ONEOK is in violation of the subject regulation;
 - 3.6. The NOPV fails to explain its conclusions in a manner that is sufficient to allow ONEOK a reasonable opportunity to prepare an adequate defense;
 - 3.7. PHMSA has failed to meet its burden of proof that a violation occurred; and
 - 3.8. The evidence demonstrates ONEOK's good faith efforts on multiple occasions to act in conformance with the relevant regulatory requirement.
4. 49 C.F.R. § 195.402(a) Procedural manual for operations, maintenance, and emergencies; by failing to follow procedure SFT-702 for limiting the amount of product in the flare accumulator tank.

ONEOK disputes and objects to the allegations stated in the NOPV, in that:

- 4.1. ONEOK NGL Pipeline neither owns nor operates the components of the Bushton Facility which are the subject of this alleged violation;

- 4.2. The NOPV omits to present a statement of the evidence upon which this alleged violation is based;
 - 4.3. The subject facility components are not part of a pipeline system or a pipeline facility;
 - 4.4. The alleged violation is not supported by the evidence in the case file;
 - 4.5. The NOPV fails to make factual findings or to explain, discuss, or analyze the conclusion that ONEOK is in violation of the subject regulation;
 - 4.6. The NOPV fails to explain its conclusions in a manner that is sufficient to allow ONEOK a reasonable opportunity to prepare an adequate defense;
 - 4.7. PHMSA has failed to meet its burden of proof that a violation occurred; and
 - 4.8. The flare accumulator tank is not related to the safe operation of any pipeline system.
5. 49 CFR § 195.402(a) Procedural manual for operations, maintenance, and emergencies; by failing to follow procedure SF Flare / Drain by closing a thermal relief isolation valve on Line 108 which exposed the line to possible overpressurization.

ONEOK disputes and objects to the allegations stated in the NOPV, in that:

- 5.1. ONEOK NGL Pipeline neither owns nor operates the components of the Bushton Facility which are the subject of this alleged violation;
 - 5.2. The NOPV omits to present a statement of the evidence upon which this alleged violation is based;
 - 5.3. The subject facility components are not part of a pipeline system or a pipeline facility;
 - 5.4. The alleged violation is not supported by the evidence in the case file;
 - 5.5. The NOPV fails to make factual findings or to explain, discuss, or analyze the conclusion that ONEOK is in violation of the subject regulation;
 - 5.6. The NOPV fails to explain its conclusions in a manner that is sufficient to allow ONEOK a reasonable opportunity to prepare an adequate defense; and
 - 5.7. PHMSA has failed to meet its burden of proof that a violation occurred.
6. 49 CFR § 195.408 Communications; by failing to have a functioning communication system for monitoring the fluid level in the flare accumulator tank involved in controlling receipt of hazardous liquid as necessary for the safe operation of the pipeline system.

ONEOK disputes and objects to the allegations stated in the NOPV, in that:

- 6.1. ONEOK NGL Pipeline neither owns nor operates the components of the Bushton Facility which are the subject of this alleged violation;
- 6.2. The NOPV omits to present a statement of the evidence upon which this alleged violation is based;
- 6.3. The subject facility components are not part of a pipeline system or a pipeline facility;
- 6.4. The alleged violation is not supported by the evidence in the case file;
- 6.5. The NOPV fails to make factual findings or to explain, discuss, or analyze the conclusion that ONEOK is in violation of the subject regulation;
- 6.6. The NOPV fails to explain its conclusions in a manner that is sufficient to allow ONEOK a reasonable opportunity to prepare an adequate defense;
- 6.7. PHMSA has failed to meet its burden of proof that a violation occurred;

- 6.8. Evidence of subsequent remedial measures cannot be used to support a finding of violation, is unduly prejudicial against ONEOK, and must be removed from consideration;
 - 6.9. The NOPV mischaracterizes the role of the flare accumulator tank in that it was not used to control receipt of hazardous liquid; and
 - 6.10. The flare accumulator tank is not related to the safe operation of any pipeline system.
7. § 195.406 Maximum Operating Pressure; by operating its pipeline facilities at a pressure that exceeded the design pressure of Dehydrator Vessel #1.

ONEOK disputes and objects to the allegations stated in the NOPV, in that:

- 7.1. ONEOK NGL Pipeline neither owns nor operates the components of the Bushton Facility which are the subject of this alleged violation;
 - 7.2. The NOPV omits to present a statement of the evidence upon which this alleged violation is based;
 - 7.3. The subject facility components are not part of a pipeline system or a pipeline facility;
 - 7.4. The alleged violation is not supported by the evidence in the case file;
 - 7.5. The NOPV fails to make factual findings or to explain, discuss, or analyze the conclusion that ONEOK is in violation of the subject regulation;
 - 7.6. The NOPV fails to explain its conclusions in a manner that is sufficient to allow ONEOK a reasonable opportunity to prepare an adequate defense; and
 - 7.7. PHMSA has failed to meet its burden of proof that a violation occurred;
 - 7.8. Evidence of subsequent remedial measures cannot be used to support a finding of violation, is unduly prejudicial against ONEOK, and must be removed from consideration;
 - 7.9. The NOPV contains no direct evidence of the pressure to which Dehydrator Vessel #1 was subjected;
 - 7.10. ONEOK objects to PHMSA's description of Line 800 pressures which it alleges "flowed product to the dehydration isolation valve" on the grounds that no discussion or explanation is given of the implications of said pressures and, as such, the Line 800 data is irrelevant and prejudicial against ONEOK, should be eliminated from consideration, and cannot support the alleged violation;
 - 7.11. ONEOK objects to the description in the underlying Violation Report (Sec. C1) of Dehydration Unit #2 in that Dehydration Unit #2 is not the subject of the alleged violation, and thus the Dehydration Unit #2 data is irrelevant and prejudicial against ONEOK, should be eliminated from consideration, and cannot support the alleged violation.
8. § 195.420 Valve Maintenance; by failing to maintain Valves 182 and 152 in good working order and failing to maintain the water-dump control valve on the Buckeye Y-grade system in good working order, in each case necessary for the safe operation of the pipeline system.

ONEOK disputes and objects to the allegations stated in the NOPV, in that:

- 8.1. ONEOK NGL Pipeline neither owns nor operates the components of the Bushton Facility which are the subject of this alleged violation;
 - 8.2. The NOPV omits to present a statement of the evidence upon which this alleged violation is based;
 - 8.3. The subject facility components are not part of a pipeline system or a pipeline facility;
 - 8.4. The alleged violation is not supported by the evidence in the case file;
 - 8.5. The NOPV fails to make factual findings or to explain, discuss, or analyze the conclusion that ONEOK is in violation of the subject regulation;
 - 8.6. The NOPV fails to explain its conclusions in a manner that is sufficient to allow ONEOK a reasonable opportunity to prepare an adequate defense; and
 - 8.7. PHMSA has failed to meet its burden of proof that a violation occurred.
9. §195.428 Overpressure Safety Devices and Overfill Protection Systems; by failing to test three pressure relief valves to determine their adequacy from the standpoint of capacity and reliability in providing overpressure protection (Dehydrator #1 – PSV-DA-167 and PSV-DA-168; and Dehydrator #2 – PSV-DA-142).

ONEOK disputes and objects to the allegations stated in the NOPV, in that:

- 9.1. ONEOK NGL Pipeline neither owns nor operates the components of the Bushton Facility which are the subject of this alleged violation;
- 9.2. The NOPV omits to present a statement of the evidence upon which this alleged violation is based;
- 9.3. The subject facility components are not part of a pipeline system or a pipeline facility;
- 9.4. The alleged violation is not supported by the evidence in the case file;
- 9.5. The NOPV fails to make factual findings or to explain, discuss, or analyze the conclusion that ONEOK is in violation of the subject regulation;
- 9.6. The NOPV fails to explain its conclusions in a manner that is sufficient to allow ONEOK a reasonable opportunity to prepare an adequate defense;
- 9.7. PHMSA has failed to meet its burden of proof that a violation occurred; and
- 9.8. PHMSA asserts as the sole basis for the alleged violation the findings of the “EN Global” report; however, as to EN Global, PHMSA has failed to establish the technical qualifications of EN Global; evaluate the facts or the sufficiency of facts relied upon by EN Global; describe the methodologies applied by EN Global or to determine the reliability of such methodologies; and determine whether or not EN Global reliably applied such methodologies.

PROPOSED CIVIL PENALTIES

Jurisdictional Issues

As to all matters asserted and alleged by PHMSA with regard to the proposed civil penalties, ONEOK disputes and objects to PHMSA’s assertion or presumption of authority to impose civil penalties with respect to any alleged violation related to any component of the Bushton Facility, except the Jurisdictional Pipelines, on the basis of the Jurisdictional Issues stated above with

respect to the Alleged Violations (Paragraphs 1 – 5), which Jurisdictional Issues ONEOK restates and incorporates herein by this reference.

Issues Stated in the Alternative

In the alternative to the foregoing jurisdictional issues, and solely in the event that PHMSA concludes that the Bushton Facility is subject to PHMSA's legal and regulatory authority, ONEOK sets out below its factual, legal and regulatory issues that relate to the proposed civil penalties.

PHMSA proposes a total of \$559,100 in civil penalties in connection with the nine alleged violations, as to which ONEOK NGL Pipeline and ONEOK Storage state their issues:

1. As to all proposed civil penalties, the NOPV provides insufficient evidentiary basis for, and no explanation, discussion or analysis of, the manner in which the penalty amounts were determined, and thus ONEOK has no reasonable opportunity to prepare an adequate defense to contest the proposed civil penalties, and on those grounds the proposed civil penalties should be withdrawn in their entirety.
2. As to all proposed civil penalties, PHMSA has failed to make available to the public, as required by the APA, the methods and procedures by which PHMSA determines the amount of proposed civil penalties and the amounts eventually assessed, and, thus, the proposed civil penalties should be withdrawn in their entirety.
3. As to all proposed civil penalties, PHMSA's proffer of evidence of subsequent remedial measures in this context is unduly prejudicial against ONEOK, and, thus, the proposed civil penalties should be significantly reduced or withdrawn in their entirety.
4. As to the proposed civil penalty for Item 7, PHMSA concludes that ONEOK was culpable because "ONEOK had no pressure monitoring on the dehydration units to ensure that they were not receiving line pressure." That statement must be excluded from consideration for at least three reasons: (1) the statement is not supported by the evidence in the case file; (2) the alleged violation in question goes to valve maintenance, not to the maintenance of pressure monitoring equipment; and (3) the statement is irrelevant and prejudicial against ONEOK. As such, the cited statement must be eliminated from consideration with regard to the penalty assessment consideration of culpability, and the civil penalty that was assessed must be significantly reduced or eliminated in its entirety.
5. As to all proposed civil penalties, the NOPV and the underlying Violation Report provide insufficient evidentiary basis for, and no explanation, discussion or analysis of the penalty assessment considerations of 49 CFR §190.225 in support of the proposed civil penalties, and thus ONEOK has no reasonable opportunity to prepare an adequate defense to contest any of the proposed civil penalties, and on those grounds the proposed civil penalties should be withdrawn in their entirety.

6. As to each proposed civil penalty, to the extent that the related alleged violation is not supported by substantial evidence, a rational connection between facts found and conclusions drawn, regulation, or law, such proposed civil penalty may not be imposed and must be withdrawn in its entirety.
7. As to all proposed civil penalties, ONEOK objects to the magnitude of the proposed penalties as unreasonable; disproportional to any of the penalty assessment considerations of 49 C.F.R. § 190.225; unsupported by sufficient evidence, or analysis that applies, the penalty assessment considerations; arbitrary, capricious or otherwise not in accordance with the law; and an abuse of discretion. On those grounds the proposed civil penalties should be withdrawn in their entirety.

PROPOSED COMPLIANCE ORDER

Jurisdictional Issues

As to all matters asserted and alleged by PHMSA with regard to the proposed compliance order, ONEOK disputes and objects to PHMSA's assertion or presumption of authority to order compliance in regard to any component of the Bushton Facility, except the Jurisdictional Pipelines, on the basis of the Jurisdictional Issues stated above with respect to the Alleged Violations (Paragraphs 1 – 5), which Jurisdictional Issues ONEOK restates and incorporates herein by this reference.

Issues Stated in the Alternative

In the alternative to the foregoing jurisdictional issues, and solely in the event that PHMSA concludes that the Bushton Facility is subject to PHMSA's legal and regulatory authority, ONEOK sets out below its factual, legal and regulatory issues that relate to the proposed compliance order.

PHMSA has proposed to order ONEOK to perform the following actions, as to which ONEOK NGL Pipeline and ONEOK Storage state their issues:

1. Regarding the alleged violation in Item 2 of the NOPV, submit DOT Form 7000-1 for the flare event.
 - 1.1. In the absence of a finding of violation, a proposed compliance order may not be supported; and
 - 1.2. PHMSA has neither proffered any evidence, made any factual findings, nor provided any explanation, discussion or analysis of the manner in which the alleged violations or the public interest warrant issuance of the proposed compliance order; *see* 49 C.F.R. § 190.217. On those grounds, Item 1 of the proposed compliance order must be withdrawn in its entirety for failure to fulfill a regulatory requirement.

CONCLUSION

At the hearing in this matter, ONEOK intends to bring forth evidence in the form of documents and/or witness testimony, as well as to present its arguments, in support of the issues stated heretofore. ONEOK reserves the right to supplement this Statement of Issues at or before the hearing.

COUNSEL FOR
ONEOK NGL Pipeline, L.L.C.
and
ONEOK Underground Storage Company, L.L.C.

July 12, 2013



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