



Southern Star Central Gas Pipeline, Inc.

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Owensboro, Kentucky 42301

Phone 270/852-5000

October 30, 2018

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
Central Region Office
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

Mr. Allan Beshore,

RE: Response to Notice of Probable Violation and Proposed Civil Penalty (CPF 3-2018-1002)

On October 3, 2018 you issued a Notice of Probable Violation (NOPV) and Proposed Civil Penalty (PCP) letter to Southern Star Central Gas Pipeline, Inc (Southern Star) outlining a Probable Violation based on inspections, which were performed by the Central Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code. In the letter, PHMSA alleged that Southern Star committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations, particularly: §192.201 Required capacity of pressure relieving and limiting stations.

With respect to §192.201, PHMSA alleged that Southern Star failed to have its pressure limiting device set to operate at a pressure that would not exceed the maximum allowable operating pressure plus 10 percent. Southern Star does not contest these findings.

Following the 2017 audit and identification of the aforementioned item, Southern Star executed a 2018 project to install adequate overpressure protection to protect the downstream Maximum Allowable Operating Pressures (MAOP) at the Tonganoxie Compressor Station. The project was completed on 6/6/2018 and included the following items:

- Replace rupture discs with relief valves (Engines #5 and #6)
- Replace undersized relief with new relief valve (Engine #7)
- Install new relief valve (Discharge to lines ED and E).

PHMSA has proposed a penalty of \$29,300 for the violation of §192.201. Southern Star would like to request that the penalty be waived based off the previously completed action items and the incurred costs totaling \$269,656.

Southern Star is committed to operating a safe and reliable pipeline and will continue to take measures daily to protect those individuals who live and work along our pipeline system.

Sincerely,

/s/ 

V.P. & Chief Operations Officer