



December 21, 2007

Mr. R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Material Safety Administration  
8701 South Gessner, Ste. 1110  
Houston, TX 77074

Ref: CPF No. 4-2007-1016M  
OkTex Pipeline Company, L.L.C.

Dear Mr. Seeley:

This letter is sent in response to your Notice of Amendment (NOA), dated December 3, 2007, regarding the above-referenced inspection of the OkTex Pipeline Company LLC operations and maintenance procedures performed in Tulsa, Oklahoma, August 20-24, 2007, by representatives of the PHMSA.

Each apparent inadequacy noted in the NOA is restated in *Italics* with the appropriate corrective action appearing directly below it.

1. *OkTex Pipeline Company, LLC needs to clarify the term "periodically reviews" for each of the stated criteria used in class location confirmation.*

OkTex O&M Procedure 401, Class Location Confirmation, has been changed to state that Class location confirmation reports/surveys must be reviewed "At least annually" by local area superintendents, or their designees, to validate "possible class location changes and/or new high consequence areas."

2. *OkTex Pipeline Company, LLC needs a procedure for the process they currently have for receiving and recording notification of planned excavation activities.*

OkTex O&M Procedure 407, Line Locates, has been changed to include new procedure sections for receiving and handling line locate requests involving third-party excavation activities.

3. *OkTex Pipeline Company, LLC needs a procedure to address collection and preservation of failed specimens; additionally, OkTex Pipeline Company, LLC needs a procedure for tracking the "chain of custody" for gathered specimens.*

OkTex O&M Procedure 411, Investigation of Material Failures, has been changed to include additional requirements for specimen collection, sampling, and specimen/sample preservation. A Chain of Custody procedure section has also been added.

4. *OkTex Pipeline Company, LLC needs to address record retention time for repairs made to pipe and for each repair made to parts of the pipeline system other than pipe.*

OkTex O&M Procedure 506, Transmission Repair Methods, has been changed to include the applicable record retention requirements of §192.709. Additionally, the Forms/Reports section at the back of the manual has been revised to include the record retention requirements of §192.709 that are applicable to those forms and reports listed in that section.

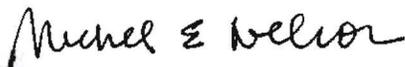
5. *OkTex Pipeline Company, LLC needs to define what "partially operate valve" means for the different type of valves in its system.*

OkTex O&M Procedure 513, Regulator and Relief Valve **Inspection**, has been changed to add the wording, "using sufficient pressure to bring it off its seat" to clarify what is meant by "partially operate valve" in that procedure.

OkTex O&M Procedure 514, Emergency Valve Inspection, has been changed to add the wording, "The valve shall be considered partially operated when there is movement on the valve's open/closed indicator and the valve has been turned enough to prove that the valve is operable" to clarify what is meant by "partially operate valve" in that procedure.

If you have additional questions or concerns, please contact me at 918-588-7944. Copies of any of the revised procedures mentioned in this response can be provided as an electronic file or hardcopy, as required.

Sincerely,



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Michel E. Nelson  
Senior Vice President – Natural Gas Pipeline Operations

cc: M. E. Nelson      S. M. Studtmann  
R. E. Renegar      D. E. McKeever  
R. K. Adams      T. S. Smith  
K. A. Kelly