August 7, 2009

Mr. R. M. Seeley, Director
U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration
8701 South Gessner, Suite 1110
Houston, Texas 77074

RE: Notice of Probable Violation (CPF 4-2009-1018)

This letter is in response to your most recent July 6, 2009 notice of probable violation and proposed compliance order. Please find the information and documentation enclosed representing the corrective actions taken to meet the proposed compliance order referenced above.

No. 1
Transmission Line Valves

The valve and operating device to open or close each valve along the pipeline is now protected from tampering and damage. Locks, barricades and/or fences have been added where needed.

Womble Tap Valve: Pipe barricade installed.
Brewster Check Station: Additional pipe barricade installed.
Perico Regulator Station: Chain Link Fence around entire station - Locked
Carter Block Valve: Pipe barricade installed
El Paso Check Station: Chain Link Fence around entire station – Locked
Kitchens Block Valve Cement valve box and lid - Locked

(Please see enclosed pictures for each station)
No. 2
Atmospheric corrosion control: General

Corrective action has been taken to eliminate active corrosion at the pipe supports at several locations listed below: Pipe at support area has been cleaned recoated and insulation material added between pipe and support. See pictures enclosed that represent the corrections made.

Valley Farms mainline valve
Brewster meter station
Perico regulator station

No. 3
Vault Maintenance

Locking device at the “Kitchens Valve Box” has been locked to prevent unauthorized access. (See picture enclosed)

No. 4
External corrosion control: Electrical Isolation.

Cased road crossings at the listed sites below have been excavated, test leads/stations have been installed and readings have been recorded and records are now available for future review and monitoring. (See corresponding pictures enclosed)

Cased Road Crossings:  PNM tap – picture #12
                      Felt tap - picture #11
                      Highway 56 crossing – picture # 5
                      El Paso crossing – picture # 1

No. 5
Atmospheric Corrosion Control: Monitoring

Atmospheric corrosion inspections have been completed on the entire pipeline. Records are now available for review. Deficiencies noted on the last atmospheric survey (see report enclosed) have been corrected. The stations inspected include:
Valley Farms meter station
Womble Tap
Mainline Valve assembly
Brewster Check Meter
Perico regulator station
Carter Block Valve
El Paso Check station
Kitchens block valve
Byrd block valve
Rehm block valve
No. 6
Transmission Lines: Patrolling

Patrolling of the pipeline - observing surface conditions, indication of leaks, construction activity and other factors affecting safety and operations on and along the transmission line right-of-way is routinely performed as required. We failed to complete the necessary reports to document this activity. This reporting has been completed and measures have been taken to assure documentation will be on file in the future. (See most recent patrol records enclosed)
Areas patrolled include:
PNM Tap
Felt tap
Highway 56 road crossing

No. 7
Completion of Corrections within 60 day of Final Order

All violations have been corrected and completed within the required 60 days.

No. 8
Documentation maintenance of Safety improvements

WTG has records and documentation of the improvements associated with fulfilling this Compliance Order. (The total cost for these associated cost are enclosed)

Please call if you have any questions. (806) 358-1321

Sincerely,

Bart Bean
Operations Manager
West Texas Gas, Inc.
7517 Canyon Drive
Amarillo, Texas 79110

Attachments:
PERICO STATION

WARNING GAS PIPELINE
WEST TEXAS GAS, INC.
PERICO STATION

DALHART, TEXAS
BEFORE EXCAVATING OR
IN CASE OF EMERGENCY CALL:
(806) 244-4513
ATMOSPHERIC CORROSION SURVEY

DISTRICT      DALHART      SYSTEM      MAINLINE      TRC/CC Unit      111215

INSPECTION CHECKLIST

1. Examine exposed piping for atmospheric corrosion.
   Corrosion Found?    Yes   No

2. Examine transition coating or tape for bonding and integrity

3. Examine support structures for atmospheric corrosion and mechanical integrity

4. Report remedial actions required (if any) to supervisor

Check Off

List by location all areas with Atmospheric Corrosion requirement of Part 192.485 A & B

Action taken when Atmospheric Corrosion is Present (use GPS):

- Found minor paint corrosion at Carino setting
- Found no insulation between pipeline supports and pipe
  of the Valley Farms, Crestview, and Perico settings

NAME OF INSPECTOR  Jerry Delano       DATE  1-9-09
REVIEWING SUPERVISOR  Tommy McWhirt     DATE  1/12/09

http://www.wtgcompliance.com/WTG1202.htm
Mainline Crossings  
& Pipeline Patrols  
12” & 22”

Date 1-16-09

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<th>#</th>
<th>Description</th>
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<td>#1</td>
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<td>Wilcon</td>
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Comments

Signature [Signature]  Supervisor Signature [Signature]  1-25-09
Mainline Crossings & Pipeline Patrols
12" & 22"

Date: 6-11-09

- #1 El Paso on F.M. 2202
- #2 West on Co. Rd. X
- #3 722 East of Middlewell
- #4 North of Middlewell on Middlewell Rd.
- #5 Highway 87 Nix Fertilizer Tanks
- #6 Wilcon
- #7 East Rehm
- #8 F.M. 297 & Noble Rd.
- #9 Highway 54
- #10 Valley Farmers
- #11 U.S. 56 New Mexico
- #12 411 New Mexico

Comments: Pipeline patrol incomplete due to corn clemes.

Signature: [Signature]
Supervisor Signature: [Signature]
Bart Bean

From: Derrell [dlansford@xit.net]
Sent: Wednesday, September 02, 2009 5:05 PM
To: 'Bart Bean'
Cc: 'Donny McWhirter'
Subject: DOT Cost of Repairs

Bart, in reference to our phone conversation this morning. Estimate of cost to get in compliance after the audit are as follows.

Build and install railed fence around several locations. Labor and materials...................................................5330.00
New signs at several locations........................................................................................................................................300.00
Install test stations, and paint at several locations..................................................................................3500.00

TOTAL $ 9130.00

No virus found in this incoming message.
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Version: 8.5.409 / Virus Database: 270.13.75/2341 - Release Date: 09/02/09 05:50:00

9/9/2009