

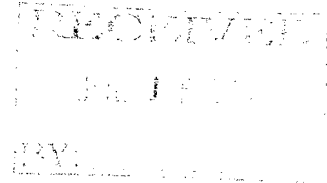


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July 14, 2009

Mr. R.M. Seeley  
Director, Southwest Region  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
Office of Pipeline Safety  
8701 South Gessner, Suite 1110  
Houston, Texas 77074  
713-272-2859



**Ref: CPF 4-2009-5002M**

Inspection of PB Energy Storage Services, Inc., Procedures and Records for Operations and Maintenance in Westlake, Louisiana.

Dear Mr. Seeley:

In response to your letter of February 18, 2009 (CPF 4-2009-5002M) providing a Notice of Amendment for the inspection performed by a representative of your Pipeline and Hazardous Materials Safety Administration (PHMSA) on our Operations and Maintenance Procedures and Records. PB Energy Storage Services, Inc (PB ESS) agrees with the findings and we have taken steps to resolve the issues identified. In accordance with the Response Options for Pipeline Operators in Compliance Proceedings, Item II (a), PB ESS has submitted in response dated 2/18/2009 explanations, information and materials in order to address the inadequacies identified in your letter. On 3/11/2009 PB ESS sent an updated letter that addressed what we felt were inadequacies to Item C of your original letter, Emergency Response Training program. We have since revised the Emergency Response Training Program and have submitted the revised procedure for your approval. Please find attached a copy of §195.403 Emergency Response Training. Also, for your convenience, a copy of the original Notice is shown in **Attachment 1**.

I would like to add that PB Energy Storage Services (PB ESS) is committed to compliance with all regulations and very committed to the safety of the public, environment and our personnel. We appreciate the opportunity show our commitment and look forward to working with the

Pipeline and Hazardous Materials Safety Administration in the future. I hope that my revisions are satisfactory. If you do find issue with any of the revisions, have any questions or require additional clarifications, please give me a call (281-589-5845) or e-mail ([fontenot@pbworld.com](mailto:fontenot@pbworld.com)).

Sincerely,



Charles J. Fontenot  
Operations Manager

*A Parsons Brinckerhoff Company*

**11757 Katy Freeway Suite 600, Houston, TX 77079**

**6950 Sulphur Drive, Beaumont, TX 77705**

**(409) 839-4602 (Beaumont Office)**

**(281) 589-5845 (Houston Office)**

**(281) 923-0317 Mobile**

**(409) 839-0510 Fax**

**E-mail Address: [fontenot@pbworld.com](mailto:fontenot@pbworld.com)**

**PBES Website : <http://www.pbenergy.com>**

**PB Website : <http://www.pbworld.com>**

Attachment

## Procedure Steps

All PB ESS employees are trained in the activities to be undertaken by them in the operation and maintenance of the Company's pipeline facilities. The training program is designed to meet regulatory training requirements and develop and maintain employee's competency and skill levels.

Training Requirements Include:

- Personnel Responsibilities in an Emergency
- Location and use of Emergency Equipment
- Properties of the Products
- Location of system maps, records and valve sites
- Emergency Procedures
- Record Keeping requirements
- Telephone and Communication Records
- Control Room Contact Number
- Notification Procedures for contacting qualified individuals on a 24hr basis

The PB ESS Emergency Response Manual includes procedures for the following to provide safety when an emergency condition occurs:

- (1) Receiving, identifying, and classifying notices of events which need immediate response by the operator or notice to fire, police, or other appropriate public officials and communicating this information to appropriate operator personnel for corrective action.
  - Reference-Emergency Response Plan-General Information-page 5
  - Reference-Emergency Response Plan-Notification – page 17-18
  - Reference-Emergency Response Plan-Emergency Flow Chart page-13
  - Reference-Emergency Response Plan-Forms F2 and F3 page 75-76
  - Reference-Emergency Response Plan-Emergency Responder page 50
- (2) Carry out the emergency procedures established under 195.402 that relate to their assignments;
  - Reference- O&M Procedures Section 5
- (3) Know the characteristics and hazards of the hazardous liquids or carbon dioxide transported, including, in case of flammable HVL, flammability of mixtures with air, odorless vapors, and water reactions;
  - Reference- Emergency Response Plan-MSDS page 78
- (4) Recognize conditions that are likely to cause emergencies, predict the consequences

of facility malfunctions or failures and hazardous liquids or carbon dioxide spills, and take appropriate corrective action;

- Reference -O&M-Handling Abnormal Condition procedures
- Reference -O&M-Section 5 procedure 195.402 (d)(1)
- Reference-Emergency Response Plan-MSDS page 78

(5) Take steps necessary to control any accidental release of hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity, or environmental damage;

- Reference-Emergency Response Plan-Emergency Response Action
- Reference-Emergency Response Plan-Emergency Shutdown Procedure

(6) Learn the potential causes, types, sizes, and consequences of fire and the appropriate use of portable fire extinguishers and other on-site fire control equipment, involving, where feasible, a simulated pipeline emergency condition.

- Reference-Emergency Response Plan
- Reference-O&M- Maps HCA's page 33

At the intervals not exceeding 15 months, but at least once each calendar year, PB ESS Supervisors should:

(a) Review with personnel their performance in meeting the objectives of the emergency response training program and Manual;

(b) Make appropriate changes to the emergency response training program as necessary to ensure that it is effective.

(7) Minimization of public exposure to injury and probability of accidental ignition by assisting with evacuation of residents and assisting with halting traffic on roads and railroads in the affected area, or taking other appropriate action.

- Reference -O&M-Immediate Response Areas/Maps & HCA's/ICS page58
- Reference - Emergency Response Plan - Control of affected Public page 52

(8) Notifying fire, police, and other appropriate public officials of hazardous liquid or carbon dioxide pipeline emergencies and coordinating with them preplanned and actual responses during an emergency, including additional precautions necessary for an emergency involving a pipeline system transporting a highly volatile liquid.

- Reference -O&M-Maps & HCA's
- Reference - Emergency Response Plan-Emergency Notification page 17-18
- Reference - Emergency Response Plan-MSDS page 78

(9) In the case of failure of a pipeline system transporting a highly volatile liquid, use of

appropriate instruments to assess the extent and coverage of the vapor cloud and determine the hazardous areas.

- Reference- Contractor List- Monitoring (Hygienist)

(10) Providing for a post accident review of employee activities to determine whether the procedures were effective in each emergency and taking corrective action where deficiencies are found.

- Investigation Report to analyze the event.

(f) *Safety-related condition reports.* The PB ESS Hazardous Liquids Pipeline Operation manual includes instructions enabling personnel who perform operation and maintenance activities and to recognize conditions that may be safety-related conditions and are subject to the reporting requirements of §195.55.

The training program consists of initial training, refresher training and emergency response drills. Emergency response drills are used to practice and evaluate emergency response plans and train employees in conducting response activities by reacting to simulated incidents. Several types of drills may be conducted, including: Notification Drills, Equipment Deployment Drills, Tabletop Incident Management Exercises, and Unannounced Incident Response Drills.

All training activities are documented. Training records for each employee are maintained locally.

Initial training involves the study and review of the PB ESS O&M Manual & Emergency Response Manual.

- Field Operations Supervisors shall review with personnel and document the review of the O&M Manual that pertains to their operation including Emergency Response Plans.
- Particular attention should be paid to the Product MSDS included in the Emergency Response Plan.

Initial training will also include HAZWOPER training

- Certain job titles have been grouped into categories for determining required levels of training to maintain emergency response competency and comply with OSHA 1910.120 (Hazardous Waste Operations and Emergency Response HAZWOPER regulation).

At a minimum,

- Employees that would be expected to respond and mitigate an emergency at the field level will be trained to the HazMat

Technician level.

- Employees that function in a control center and administrative personnel will be trained to the First Responder - Operations level.
- Annual Training consists of HAZWOPER refresher training, and Computer-Based Training (CBT).
- Attending safety meetings and emergency response training exercises and/or completing various CBT modules will also accomplish required refresher training.
- Employees must complete all CBT modules related to their current job duties as soon as practical. New modules relevant to an employee's assignment that are added to the CBT library should be completed within one year of introduction.
- Employees are required to complete annual refresher training on fire extinguisher operation including hands on insipient stage fire extinguisher training.



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Attachment 1  
Pipeline and Hazardous Materials Administration  
Notice of Amendment



U.S. Department  
of Transportation  
**Pipeline and  
Hazardous Materials Safety  
Administration**

8701 South Galleria, Suite 1110  
Houston, TX 77074

**NOTICE OF AMENDMENT**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

February 18, 2009

Mr. Roger Blair  
President  
PB Energy Storage Services, Inc.  
11757 Katy Freeway, Suite 600  
Houston, TX 77099

**CPF 4-2009-5002M**

Dear Mr. Blair:

On October 28-29, 2008, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your procedures and records for operations and maintenance in Westlake, Louisiana.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within PB Energy Storage Services' procedures and are described below.

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
  - a) **General.** Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 18 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.
- A. **§195.54 Accident reports.**
  - (a) Each operator that experiences an accident that is required to be reported under §195.56 shall as soon as practicable but not later



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- (b) than 30 days after discovery of the accident, prepare and file an accident report on DOT Form 7000-1, or a facsimile.
- (c) Whenever an operator receives any changes in the information reported or additions to the original report on DOT Form 7000-1, it shall file a supplemental report within 30 days of new information.

PB Energy Storage Services must amend their procedures to state that the supplemental report must be filed within 30 days of new information.

**B. §195.302 Pressure testing**

- (a) Except as otherwise provided in this section and in §195.305(b), no operator may operate a pipeline unless it has been pressure tested under this subpart without leakage. In addition, no operator may return to service a segment of pipeline that has been replaced, relocated, or otherwise changed until it has been pressure tested under this subpart without leakage.

PB Energy Storage Services pressure testing procedure contains an incorrect reference in their procedures manual. They must amend their procedures to refer to the correct current testing procedure.

**C. §195.403 Emergency response training**

- (a) Each operator shall establish and conduct a continuing training program to instruct emergency response personnel to:
  - (1) Carry out the emergency procedures established under 195.402 that relate to their assignments;
  - (2) Know the characteristics and hazards of the hazardous liquids or carbon dioxide transported, including, in case of flammable HVL, flammability of mixtures with air, odorless vapors, and water reactions;
  - (3) Recognize conditions that are likely to cause emergencies, predict the consequences of facility malfunctions or failures and hazardous liquids or carbon dioxide spills, and take appropriate corrective action;
  - (4) Take steps necessary to control any accidental release hazardous liquid or carbon dioxide and to minimize the potential for fire, explosion, toxicity, or environmental damage; and
  - (5) Learn the potential causes, types, sizes, and consequences of fire and the appropriate use of portable fire extinguishers and other on-site fire control equipment, involving, where feasible, a simulated pipeline emergency condition.





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PB Energy Storage Services currently have inadequate procedures for emergency response training in their procedures manual. Specific procedures for emergency response training must be developed that address conditions specific to PB Energy Services' operations as required in §195.403.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

In correspondence concerning this matter, please refer to CPF No 4-2009-5002M and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous  
Material Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance*



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## **Response Options for Pipeline Operators in Compliance Proceedings**

The requirements of 49 C.F.R. Part 190, Subpart B (§§ 190.201-190.237) govern response to Notices issued by a Regional Director, Pipeline and Hazardous Materials Safety Administration (PHMSA).

Be advised that all material submitted by a respondent in response to an enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

### **I. Procedures for Responding to a NOTICE OF PROBABLE VIOLATION:**

Within 30 days of receipt of a Notice of Probable Violation, the respondent shall respond to the Regional Director who issued the Notice in the following way:

#### **a. When the Notice contains a proposed CIVIL PENALTY\* --**

1. If you are not contesting any violations alleged in the Notice, pay the proposed civil penalty and advise the Regional Director of the payment. This authorizes PHMSA to make findings and to close the case with prejudice to the respondent. Payment terms are outlined below;
2. If you are not contesting any violations alleged in the Notice but wish to submit written explanations, information, or other materials you believe warrant mitigation of the civil penalty, you may submit such materials. This authorizes PHMSA to make findings and to issue a Final Order assessing a penalty amount up to the amount proposed in the Notice;
3. If you are contesting one or more of the items in the Notice but are not requesting an oral hearing, submit a written response to the allegations and/or seek elimination or mitigation of the proposed civil penalty. Refer to 49 C.F.R. § 190.225 for assessment considerations, which include the respondent's ability to pay and the effect on the respondent's ability to stay in business, upon which civil penalties are based; or
4. Request a hearing as described below to contest the allegations and/or proposed assessment of a civil penalty.

#### **b. When the Notice contains a proposed COMPLIANCE ORDER\* --**

1. If you are not contesting the compliance order, notify the Regional Director that you intend to take the steps in the proposed compliance order;



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2. If you are not contesting the compliance order but wish to submit written explanations, information, or other materials you believe warrant modification of the proposed compliance order in whole or in part, or you seek clarification of the terms of the proposed compliance order, you may submit such materials. This authorizes PHMSA to make findings and issue a compliance order;
3. If you are contesting the proposed compliance order but are not requesting an oral hearing, submit written explanations, information, or other materials in answer to the allegations in the Notice and stating your reasons for objecting to the proposed compliance order items in whole or in part; or
4. Request a hearing as described below to contest the allegations and/or proposed compliance order items.

c. When the Notice contains a WARNING ITEM –

No written response is required. The respondent is warned that if it does not take appropriate action to correct these items, enforcement action will be taken if a subsequent inspection reveals a violation.

\* Failure of the respondent to respond to the Notice within 30 days of receipt constitutes a waiver of the right to contest the allegations in the Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in the Notice without further notice to the respondent and to issue a Final Order.

II. Procedures for Responding to a NOTICE OF AMENDMENT\*–

Within 30 days of receipt of a Notice of Amendment, the respondent shall respond to the Regional Director who issued the Notice in the following way:

- a. If you are not contesting the Notice, notify the Regional Director of your plans to address the inadequacies identified in the Notice;
- b. If you are not contesting the Notice but wish to submit written explanations, information, or other materials you believe warrant modification of the Notice of Amendment in whole or in part, or you seek clarification of the terms of the Notice of Amendment, you may submit such materials. This authorizes PHMSA to make findings and issue an Order Directing Amendment;
- c. If you are contesting the Notice of Amendment but are not requesting an oral hearing, submit written explanations, information, or other materials in answer to the allegations in the Notice and stating your reasons for objecting to the Notice of Amendment items in whole or in part; or



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d. Request a hearing as described below to contest the allegations in the Notice.

\* Failure of the respondent to respond to the Notice within 30 days of receipt constitutes a waiver of the right to contest the allegations in the Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in the Notice without further notice to the respondent and to issue a Final Order.

**III. Procedure for Requesting a Hearing**

A request for a hearing must be in writing and accompanied by a statement of the issues that the respondent intends to raise at the hearing. The issues may relate to the allegations, new information, or to the proposed compliance order or proposed civil penalty amount. Refer to 49 C.F.R. § 190.225 for assessment considerations upon which civil penalties are based. A respondent's failure to specify an issue may result in waiver of the right to raise that issue at the hearing. The respondent's request must also indicate whether or not respondent will be represented by counsel at the hearing. Failure to request a hearing in writing within 30 days of receipt of a Notice waives the right to a hearing. In addition, if the amount of the proposed civil penalty or the proposed corrective action is less than \$10,000, the hearing will be held by telephone, unless the respondent submits a written request for an in-person hearing. Complete hearing procedures can be found at 49 C.F.R. § 190.211.

**IV. Extensions of Time**

An extension of time to prepare an appropriate response to a Notice may be granted, at the agency's discretion, following submittal of a written request to the Regional Director. The request must indicate the amount of time needed and the reasons for the extension. The request must be submitted within 30 days of receipt of the Notice.

**V. Freedom of Information Act**

Any material provided to PHMSA by the respondent, and materials prepared by PHMSA including the Notice and any order issued in this case, may be considered public information and subject to disclosure under the Freedom of Information Act (FOIA). If you believe the information you are providing is security sensitive, privileged, confidential or may cause your company competitive disadvantages, please clearly identify the material and provide justification why the documents, or portions of a document, should not be released under FOIA. If we receive a request for your material, we will notify you if PHMSA, after reviewing the materials and your provided justification, determines that withholding the materials does not meet any exemption provided under the FOIA. You may appeal the agency's decision to release material under the FOIA at that time. Your appeal will stay the release of those materials until a final decision is made.

**VI. Small Business Regulatory Enforcement Fairness Act Information**

The Small Business and Agricultural Regulatory Enforcement Ombudsman and 10 Regional Fairness Boards were established to receive comments from small businesses about federal agency enforcement actions. The Ombudsman will annually evaluate the enforcement activities and rate each agency's responsiveness to small business. If you



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wish to comment on the enforcement actions of the Pipeline and Hazardous Materials Safety Administration, call 1-888-REG-FAIR (1-888-734-3247) or go to [http://www.sba.gov/ombudsman/dsp\\_faq.html](http://www.sba.gov/ombudsman/dsp_faq.html).

VII. **Payment Instructions**

***Civil Penalty Payments of Less Than \$10,000***

Payment of a civil penalty of less than \$10,000 proposed or assessed, under Subpart B of Part 190 of the Pipeline Safety Regulations can be made by certified check, money order or wire transfer. Payment by certified check or money order (containing the CPF Number for this case) should be made payable to the "Department of Transportation" and should be sent to:

Federal Aviation Administration  
Mike Monroney Aeronautical Center  
Financial Operations Division (AMZ-341) P.O. Box 25082  
Oklahoma City, OK 73125-4915

Wire transfer payments of less than \$10,000 may be made through the Federal Reserve Communications System (Fedwire) to the account of the U.S. Treasury. Detailed instructions are provided below. Questions concerning wire transfer should be directed to the Financial Operations Division at (405) 954-8893, or at the above address.

***Civil Penalty Payments of \$10,000 or more***

Payment of a civil penalty of \$10,000 or more proposed or assessed under Subpart B of Part 190 of the Pipeline Safety Regulations must be made wire transfer (49 C.F.R. § 89.21 (b)(3)), through the Federal Reserve Communications System (Fedwire) to the account of the U.S. Treasury. Detailed instructions are provided below. Questions concerning wire transfers should be directed to the Financial Operations Division at (405) 954-8893, or at the above address.



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**INSTRUCTIONS FOR ELECTRONIC FUND TRANSFERS**

(1) <u>RECEIVER ABA NO.</u> 021030004	(2) <u>TYPE/SUB-TYPE</u> (Provided by sending bank)
(3) <u>SENDING BANK ABA NO.</u> (Provided by sending bank)	(4) <u>SENDING BANK REF NO.</u> (Provided by sending bank)
(5) <u>AMOUNT</u>	(6) <u>SENDING BANK NAME</u> (Provided by sending bank)
(7) <u>RECEIVER NAME</u> TREAS NYC	(8) <u>PRODUCT CODE</u> (Normally CTR, or as provided by sending bank)
(9) <u>BENEFICIAL (BNF) = AGENCY LOCATION CODE</u> BNF = /ALC-69-14-0001	(10) <u>REASONS FOR PAYMENT</u> Example: PHMSA - CPF # / Ticket Number/Pipeline Assessment number

**INSTRUCTIONS:** You, as sender of the wire transfer, must provide the sending bank with the information for blocks (1), (5), (7), (9), and (10). The information provided in Blocks (1), (7), and (9) are constant and remain the same for all wire transfers to the Pipeline and Hazardous Materials Safety Administration, Department of Transportation.

**Block #1 - RECEIVER ABA NO. - "021030004".** Ensure the sending bank enters this 9-digit identification number; it represents the routing symbol for the U.S. Treasury at the Federal Reserve Bank in New York.

**Block #5 - AMOUNT -** You as the sender provide the amount of the transfer. Please be sure the transfer amount is punctuated with commas and a decimal point. **EXAMPLE: \$10,000.00**

**Block #7 - RECEIVER NAME - "TREAS NYC".** Ensure the sending bank enters this abbreviation. It must be used for all wire transfers to the Treasury Department.

**Block #9 - BENEFICIAL - AGENCY LOCATION CODE - "BNF=/ALC-69-14-0001".** Ensure the sending bank enters this information. This is the Agency Location Code for the Pipeline and Hazardous Materials Safety Administration, Department of Transportation.

**Block #10 - REASON FOR PAYMENT - "AC-payment for PHMSA Case # / To ensure your wire transfer is credited properly, enter the case number/ticket number or Pipeline Assessment number, and country."**

**NOTE:** A wire transfer must comply with the format and instructions or the Department cannot accept the wire transfer. You as the sender can assist this process by notifying the Financial Operations Division (405) 954-8893 at the time you send the wire transfer.

May 2008