



June 14, 2012



Mr. R. M. Seeley, Director – SW Region  
Pipeline and Hazardous Materials Safety Administration  
8701 South Gessner, Suite 1110  
Houston, TX 77074

Re: CPF 4-2012-1008

Dear Mr. Seeley:

West Texas Gas, Inc. (WTG) submits this correspondence as our response to the Notice of Probable Violation dated May 16, 2012 relating to the referenced docket.

1. §192.616 *Public Awareness*

*(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why conditions with all or certain provisions of the recommended practice is not practicable and not necessary for safety.*

WTG acknowledges that its PAP requires revision to incorporate those unique attributes and characteristics of WTG's various pipeline systems. WTG has taken steps to begin this revision process and will submit its revised PAP to the PHMSA Southwest Region within the allowed 180 day period following issuance of the Final Order on the referenced docket.

2. §192.616 *Public Awareness*

*(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why conditions with all or certain provisions of the recommended practice is not practicable and not necessary for safety.*

WTG contends that annual reviews on the implementation of the PAP were performed through (i) information distribution, presentation and discussion during annual training/education meetings held with WTG's field management personnel, (ii) annual discussion and review with WTG's independent PAP consulting firm (Celeritas), and (iii) the ongoing review of line locate data versus 3<sup>rd</sup> party pipeline damage reports (which have declined significantly over the past few years when compared to the number of line locates requests).

WTG acknowledges that formal documentation of these annual reviews is limited and not in proper form. WTG will address this formal documentation and future compliance with Appendix E of API RP 1162 in specific revisions to WTG's PAP.

3. §192.616 *Public Awareness*

*(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why conditions with all or certain provisions of the recommended practice is not practicable and not necessary for safety.*

WTG acknowledges that a formal 4-year effectiveness evaluation was not conducted in compliance with API RP 1162. WTG will address this 4-year evaluation in specific revisions to WTG's PAP.

Although WTG does not contest any violations alleged in the referenced Notice, we are requesting the Director's consideration in reducing the proposed civil penalties. WTG represents a relatively small group of utilities combining for less than 2,000 miles of transmission pipeline (only 11 miles of the total pipeline mileage within an HCA area) and less than 25,000 distribution customers. WTG is a proven operator with good compliance within the newer sections of Part 192 regulations, particularly IMP, DIMP, and OQ, and will accomplish similar compliance with its PAP as quickly as possible. We request your forbearance in establishing these civil penalties.

Your consideration of these comments will be greatly appreciated.

Very truly yours,



Richard D. Hatchett  
Vice President

cc: Jack Morris  
Bart Bean  
Ray Reed