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BY: \_\_\_\_\_

July 12, 2013

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

RE: Notice of Probable Violation and Proposed Compliance Order 4-2013-5013 dated June 13, 2013

Dear Mr. Seely:

Please accept this letter in response to the Notice of Probable Violation and Proposed Compliance Order Amendment delivered to Trinity Pipeline GP LLC, as a result of an inspection by a representative of the Pipeline and Hazardous Materials Safety Administration in September 2012. The items are addressed in the order of your letter received June 17<sup>th</sup>, 2013.

### NOTICE OF PROBABLE VIOLATION AND PROPOSED COMPLIANCE ORDER ITEMS

1. Trinity will remove the clock spring in question with the supervision of a Clock Spring representative and a qualified 3<sup>rd</sup> party. After removal and inspection using a dye penetrant for cracks; Trinity will use an accepted method of repair, which may include installation of new Clock Springs. If your office objects to using Clock Spring as repair device option, please inform us no later than 30 days so that we can proceed with the repair.

Further, we have confirmed with Clock Spring that removal of the coating 4-6" on each side of the area to be sleeved is not required if the coating is FBE, which is the type coating we have. Thus, we feel we have used the correct procedure as to this particular issue.

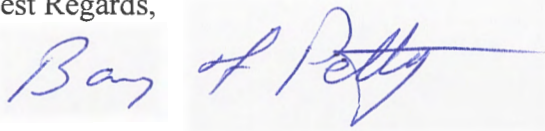
A management of change form is attached for our O&M Manual broadening our ability to use industry standard repair methods ("Exhibit A", Page 2).

2. Trinity's Senior Pipeline Operator successfully completed his **NACE CP1 – Cathodic Protection Tester** certification on January 24<sup>th</sup>, 2013. (see attached certification "Exhibit B").

3. Trinity has purchased two Vivax-Metrotech vLocPro 2 line locators and all qualified pipeline operators are trained on the new equipment (see attached training certifications "Exhibit C"). In addition, Trinity has changed its line locate procedure (MOC attached "Exhibit D").
4. In September of 2012, Trinity updated its Operation and Maintenance manual to include the process for considering voltage drop. In December of 2012, Trinity implemented the process to consider voltage drop using the -0.850 V ON criteria during its annual cathodic survey so that we now consider voltage drop and we have implemented the use of interrupters. The results of this survey are attached ("Exhibit E").
5. Trinity will have a Close Interval Survey performed as soon as reasonable possible with available contractors. Trinity is interviewing qualified 3<sup>rd</sup> party contractors and our goal is to complete the survey in calendar year 2013.

Please advise if any of these responses are not sufficient or more detail is needed. As always, Trinity will make every effort to comply with 195 regulations and the Pipeline and Hazardous Materials Safety Administration, to ensure the safe operation of its pipelines.

Best Regards,

A handwritten signature in blue ink that reads "Barry F. Petty". The signature is written in a cursive style and is positioned to the right of the typed name.

Barry F. Petty  
President & CEO  
Trinity Pipeline GP LLC  
401 W. Wall St. Midland, TX 79701  
Office: (432) 683-8265 Fax: (432) 683-8266