

**U.S. DEPARTMENT OF TRANSPORTATION  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION  
OFFICE OF PIPELINE SAFETY**

	)	
<b>In the Matter of</b>	)	
	)	
<b>Targa NGL Pipeline Co.,</b>	)	<b>CPF No. 4-2018-5024M</b>
	)	
<b>Respondent.</b>	)	
	)	

**REQUEST FOR HEARING AND PRELIMINARY STATEMENT OF ISSUES**

**I. Request for Hearing**

On November 13, 2018, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Amendment (Notice) in the above-captioned proceeding. Pursuant to 49 C.F.R. §§ 190.206(a) and 190.211, Targa NGL Pipeline Co. (Targa) respectfully requests an in-person hearing to contest the Notice. Targa will be represented by counsel at the hearing.

**II. Preliminary Statement of Issues**

**A. Notice Item No. 1**

Targa respectfully contests the allegation that its procedures for complying with 49 C.F.R. § 195.446(c)(4) are inadequate and intends to raise the following issues at the hearing.

1. Whether PHMSA has met its burden to prove the allegation in the Notice.
2. Whether PHMSA’s interpretation of the regulation cited in the Notice is reasonable and consistent with the text, history, and purpose of that regulation.

**B. Notice Item No. 2**

Targa respectfully contests the allegation that its procedures for complying with 49 C.F.R. § 195.452(e) are inadequate and intends to raise the following issues at the hearing.

1. Whether PHMSA has met its burden to prove the allegation in the Notice.
2. Whether PHMSA’s interpretation of the regulation cited in the Notice is

reasonable and consistent with the text, history, and purpose of that regulation.

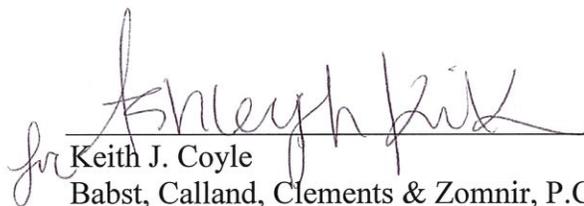
**C. Notice Item No. 3**

Targa respectfully contests the allegation that its procedures for complying with 49 C.F.R. § 195.452(j) are inadequate and intends to raise the following issues at the hearing.

1. Whether PHMSA has met its burden to prove the allegation in the Notice.
2. Whether PHMSA's interpretation of the cited regulation is reasonable and consistent with the text, history, and purpose of that regulation.

Targa reserves the right to revise and supplement this Preliminary Statement of Issues as needed based on any new information or argument provided by PHMSA in this matter.

Respectfully Submitted on this 30 day of January, 2019

  
for Keith J. Coyle  
Babst, Calland, Clements & Zomnir, P.C.  
505 9<sup>th</sup> St. NW, Suite 700  
Washington DC, 20004  
(202) 853-3460  
[KCoyle@babstcalland.com](mailto:KCoyle@babstcalland.com)  
Counsel for Targa NGL Pipeline Co.