



Southern Star Central Gas Pipeline, Inc.
4700 State Route 56
P.O. Box 20010
Owensboro, Kentucky 42304-0010
Phone 270/852-5000

December 11, 2023

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
Central Region Office
901 Locust Street, Suite 480
Kansas City, Missouri 64106

Mr. Gregory Ochs,

RE: Response to Warning Letter (CPF 3-2023-034-WL)

On November 29, 2023, you issued a Warning Letter to Southern Star Central Gas Pipeline, Inc (Southern Star) outlining two Notice of Probably Violations (NOPV) based upon an inspection, which was performed pursuant to Chapter 601 of 49 United States Code. In the Warning Letter, PHMSA alleged that Southern Star has committed probable violations of the Pipeline Safety Regulations:

- Item 1 – Violation of §192.161 Supports and anchors – Southern Star failed to provide supports that completely encircle the pipeline on an exposed pipeline.
- Item 2 – Violation of §192.317 Protection from hazards – Southern Star failed to take all practicable steps to protect its transmission line from a hazard that could cause the pipeline to move or sustain an abnormal load.

Southern Star's response is below to the proposed violation items:

Southern Star's Nash Compressor Station was constructed and operated by a non-Southern Star entity prior to 2023. In May of 2023, Southern Star submitted the PHMSA form 1000.2 Type B (Change in Entity Operating) with an effective date of 05/10/2023. Following this effective date, Southern Star became the operator of record for the Nash facility encompassed by Southern Star's OPID # 31711. Southern Star does not contest the findings in the warning letter. While the station engines and auxiliary equipment are on engineered foundations, the station's suction and discharge piping require remediation. Southern Star has a project currently in the scoping / estimating phase with plans to execute on the remediation project in 2024. In the interim, Southern Star will perform regularly scheduled patrols as well as additional patrols of this piping during other routine station maintenance activities.

Southern Star is committed to operating a safe and reliable pipeline system and will continue to take measures daily to protect those individuals who live and work along our system.

Sincerely,

/s/ 

Charles C. Crews
V.P. & Chief Operations Officer