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By Email Only

December 19, 2024

Mr. Gregory A. Ochs
Director, Central Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106

Re: Texas Gas Transmission, LLC, CPF No. 3-2024-062-NOPV
Written Response to Notice of Probable Violation, Proposed Civil Penalty, and Proposed
Compliance Order;
Request for Hearing, Preliminary Statement of Issues, and Request for Informal Meeting

Dear Mr. Ochs,

Pursuant to 49 C.F.R. § 190.208 and § 190.211, Texas Gas Transmission, LLC (Texas Gas) submits a Written Response to the Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order (Notice) issued on November 21, 2024. Texas Gas also submits a Request for Hearing, Preliminary Statement of Issues and Request for Informal Meeting to permit the parties to discuss resolution of this proceeding. Texas Gas requests that the presiding official delay scheduling a hearing to allow the parties sufficient time to convene a meeting to resolve issues.

Texas Gas requests that it continue to be provided with all documents or communications from PHMSA pertaining to the case or the case file, which includes "all agency records pertinent to the matters of fact and law asserted."¹ This request encompasses, but is not limited to inspector notes or other materials the Region intends to rely on to support the Notice and Region Director's "written evaluation of response material submitted by the respondent and recommendation for final action, if one is prepared."² Please consider this a standing request.

Texas Gas reserves the right to amend or supplement its Response and the Preliminary Statement of Issues. Texas Gas looks forward to working with you and your staff to resolve the issues raised in the Notice. Please do not hesitate to contact the undersigned if you have any questions.

Thank you for your attention on this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tony G. Rizk".

Tony G. Rizk, P.E.
VP, Technical Services
Boardwalk Pipelines

Attachments

CC: Ryan McClure, Attorney Advisor, Office of Chief Counsel, PHMSA (Ryan.McClure@DOT.gov)
Mia Petrucci, Law Clerk, Office of Chief Counsel, PHMSA (Mia.Petrucci@DOT.gov)

¹ 49 U.S.C. § 60117(b)(1)(C).

² 49 C.F.R. § 190.209(b)(7) (2023).