

By Email Only

September 12, 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: Gulf South Pipeline Company, LLC and Texas Gas Transmission, LLC,
CPF No. 3-2024-066-NOPV
Written Response to Notice of Probable Violation, Proposed Civil Penalty, and
Proposed Compliance Order and Request for Hearing, Preliminary Statement of Issues,
and Request for Informal Meeting**

Dear Mr. Ochs,

Pursuant to 49 C.F.R. § 190.208(a) and (b) and § 190.211, Gulf South Pipeline Company, LLC (Gulf South) and Texas Gas Transmission, LLC (Texas Gas) submit a Written Response to the Notice of Probable Violation, and Proposed Civil Penalty (Notice) issued on May 21, 2024. Gulf South and Texas Gas also submit a Request for Hearing, Preliminary Statement of Issues and Request for Informal Meeting to permit the parties to discuss resolution of the violation alleged in Item 2 of the Notice and the proposed compliance order. Gulf South does not contest Item 1 or the proposed civil penalty.

Gulf South and Texas Gas also request that the presiding official delay scheduling a hearing to allow the parties sufficient time to convene a meeting to resolve issues.

Gulf South and Texas Gas request that they 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 the 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.

Gulf South and Texas Gas reserve the right to amend or supplement their Response and the Preliminary Statement of Issues. The companies look forward to working with you and your staff to

¹ 49 U.S.C. § 60117(b)(1)(C).

² 49 C.F.R. § 190.209(b)(7) (2022).

resolve the issues raised in Item 2 of 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,



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)