



January 14, 2022

Ms. Mary L. McDaniel
Director, Southwest Region
Pipeline and Hazardous Materials Safety
Administration
Office of Pipeline Safety
8701 S. Gessner Road, Suite 630
Houston, Texas 77074

Via Email: Mary.McDaniel@DOT.gov

Re: ONEOK NGL Pipeline, LLC ("Respondent")
Request for Hearing
Statement of Issues
CPF No. 4-2021-048-NOPV

Dear Ms. McDaniel:

This letter serves as a request by Respondent for a hearing in response to the referenced Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order dated November 15, 2021 ("NOPV"), which was received by Respondent via email on the same date. Respondent requested an extension of time to respond to the NOPV via email dated November 30, 2021. By letter dated December 1, 2021, the Director, PHMSA Southwest Region ("Director") granted an extension of time to respond to the NOPV until January 14, 2022. As such, this response is timely.

As an initial matter, Respondent does not contest Item 1. Pursuant to 49 C.F.R. §§ 190.208(a)(4) and 190.211, Respondent hereby requests a hearing on Item 2 and Item 3 of the NOPV. Respondent has great respect for the work done by the Southwest Region and has worked collaboratively with your office in particular. However, Respondent believes requesting a hearing is necessary at this time.

Enclosed herewith please find Respondent's Statement of Issues which it submits pursuant to 49 C.F.R. § 190.211(b). Respondent reserves the right to supplement and/or amend its Statement of Issues at or before the hearing.

Respondent requests that the requested hearing be held in-person at the Southwest Region office Houston, Texas.





Please be advised that Respondent intends to be represented by in-house counsel and outside counsel in connection with the requested hearing. Respondent intends, pursuant to 49 C.F.R. § 190.211(f), to have a court reporter prepare a transcript of the hearing. Respondent will bear all costs of same and will submit a copy of the transcript of same to the case file.

Respondent respectfully requests that the Presiding Official assigned to this case forbear the setting of the hearing, for at least 90 days, to allow the parties a reasonable opportunity to commence discussions toward settlement and/or narrowing the issues. Respondent intends to contact your office promptly, and Respondent will work with PHMSA Region counsel to apprise the Presiding Official of progress in said discussions.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'V. Murchison'.

Vince Murchison
Counsel for Respondent

cc: Elizabeth Nugent (Via Email: Elizabeth.Nugent@dot.gov)
David E. Keglovits (Via Email: David.Keglovits@oneok.com)
Roina Baker (Via Email: Roina.Baker@Pipelinelegal.com)

