



September 30, 2022

Mr. Bryan Lethcoe
Director, Southwest Region
Pipeline and Hazardous Materials Safety
Administration
Office of Pipeline Safety
8701 S. Gessner Road, Suite 630
Houston, Texas 77074

Via Email: Bryan.Lethcoe@DOT.gov

Re: Florida Gas Transmission Company (“Respondent”)
Request for Hearing
Statement of Issues
CPF No. 4-2022-032-NOPV

Dear Mr. Lethcoe:

This letter serves as a request by Respondent for a hearing in response to the Notice of Probable Violation and Proposed Civil Penalty dated July 22, 2022 (the “NOPV”), which was received by Respondent via email on same date. By email of August 3, 2022, Respondent requested an extension of 45 days to respond to the NOPV. By email dated August 17, 2022, former Director, Southwest Region, Mary McDaniel, granted an extension of time to respond until October 5, 2022. As such, this response is timely.

Pursuant to 49 C.F.R. §§ 190.208(a)(4) and 190.211, Respondent hereby requests a hearing on Items 1, 2, and 3 in the referenced case.

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 said hearing be held at the Southwest Region office in 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 same to the case file.



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To allow the parties sufficient time to prepare for hearing, and, given the significance of the allegations, the technical complexity of the issues raised, and the magnitude of the civil penalties, Respondent respectfully requests that the Presiding Official assigned to this case set this matter for hearing not less than 75 days from the date of this request. We expect the hearing to consume at least one full day.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Vince Murchison', with a long horizontal flourish extending to the right.

Vince Murchison
Counsel for Respondent

cc: Ms. Mary L. McDaniel (Via Email: Mary.McDaniel@DOT.gov)
Todd Nardozzi (Via Email: Todd.Nardozzi@energytransfer.com)
Heidi Slinkard (Via Email: Heidi.Slinkard@energytransfer.com)
Roina Baker (Via Email: Roina.Baker@Pipelinelegal.com)



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