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Via Email and Regular Mail

Mr. Bryan Jeffery Lethcoe
Director, Southwestern Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074

**RE: CPF 4-2023-006-NOPV, Interior Gas Utility
Request for Informal Conference
Request for Hearing and Preliminary Statement of the Issues**

Dear Mr. Lethcoe:

Pursuant to 49 C.F.R. § 190.208, Interior Gas Utility (IGU or the Company) is providing the following response to the Notice of Probable Violation, Proposed Compliance Order, and Proposed Civil Penalty (NOPV) that the Pipeline and Hazardous Materials Safety Administration issued on May 8, 2023, in the above-captioned proceeding. IGU shares PHMSA's commitment to pipeline safety and continuous improvement. The Company believes that additional discussion of the facts and circumstances related to this matter will provide an opportunity to reach resolution without further proceedings.

I. Request for Informal Conference

Pursuant to 49 U.S.C. § 60117(b)(1)(B), IGU respectfully requests an informal conference to discuss the allegations, proposed compliance order, and proposed civil penalty in the NOPV. IGU is hopeful that through further discussion of the relevant facts and circumstances this matter can be resolved without a hearing.

II. Request for Hearing

Pursuant to 49 C.F.R. §§ 190.208(a)(4), 190.208(b)(4), and 190.211(b), IGU respectfully requests an in-person hearing at PHMSA's Anchorage, Alaska office to discuss the alleged violations, proposed compliance order, and proposed civil penalty in the NOPV. If a hearing is held, IGU will be represented by counsel at the hearing. IGU respectfully requests that the Presiding Official delay setting a hearing date in this matter until the parties have had a reasonable time to meet and discuss potential settlement.

III. Preliminary Statement of Issues

IGU respectfully contests the allegations of violation, proposed compliance order, and

proposed civil penalty in the NOPV. At the hearing, and pursuant to § 190.211(b) IGU intends to raise the following issues:

1. NOPV Allegation #1 - § 193.2441 Control Center

- a. Whether the facts and circumstances related to IGU's monitoring and control of its LNG facility are reflected in the NOPV and casefile.
- b. Whether PHMSA has met its burden of proof in demonstrating that IGU committed a violation of § 193.2441(c).
- c. Whether the proposed compliance is necessary and appropriate.
- d. Whether the proposed civil penalty is consistent with the penalty assessment considerations prescribed in 49 U.S.C. § 60122(b) and 49 C.F.R. §§ 190.221-190.225.
- e. Whether PHMSA considered IGU's status as a small business under SBA standards when developing this allegation and the proposed civil penalty.

2. NOPV Allegation #2 - § 193.2515 Investigation of Failures

- a. Whether the facts and circumstances related to IGU's investigation of the subject incident and its efforts to prevent recurrence are reflected in the NOPV and case file.
- b. Whether PHMSA has met its burden of proof in demonstrating that IGU committed a violation of § 193.2515(b).
- c. Whether the proposed compliance order is necessary and appropriate.

IGU reserves the right to supplement this preliminary statement of the issues before the hearing in this matter, should a hearing be necessary.

Please contact us at your convenience to discuss scheduling an informal conference in this matter.

Sincerely,
CSG, Inc.

By: _____

Zane D. Wilson

cc: Dan Britton, Mark Rockwell, Elena Sudduth