

September 19, 2025

Dustin Hubbard
Director, Office of Pipeline Safety-Western Region
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 340
Lakewood CO, 80228

Re: CPF No. 5-2025-026-NOPV

Dear Mr. Hubbard

Westgas Interstate, a company and wholly owned subsidiary of Xcel Energy Inc., received a notice of probable violation outlining the failure to inspect and maintain pressure limiting devices observed during a comprehensive inspection performed in 2024. Enclosed is our response to the proposed Compliance Order.

Proposed Compliance Order, as the language appears on page 5

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Westgas Interstate, Inc. (Westgas) a Compliance Order incorporating the following remedial requirements to ensure the compliance of Westgas with the pipeline safety regulations:

- A. In regard to Item 1 of the Notice pertaining to the annual inspection of each pressure limiting station, relief device, and pressure regulating station and its equipment, Westgas must inspect and test, and repair if necessary, the two slam-shut valves intended to protect against accidental over pressuring at the Chalk Bluff station to determine that they are in good mechanical condition, adequate from the standpoint of capacity and reliability of operation for the service in which they are employed, set to control at the correct pressure consistent with the pressure limits of § 192.201(a), and properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation, and send documentation of the completed inspection and testing, including any required repairs, to the Director, Western Region within 60 days of receipt of the Final Order.*
- B. It is requested (not mandated) that Westgas maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Dustin Hubbard, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2)*



1123 W 3rd Ave
Denver, CO 80223

Westgas response to proposed Compliance Order:

Westgas does not contest the allegations and proposed Compliance Order.

Per Item A, the proposed Compliance Order will be addressed via replacement or repair of the two slam-shut valves that were shown to not operate as intended during the 2024 inspection field observation. Although not required by this Compliance Order, Westgas will assign SAP maintenance plans to each of the slam-shut valves to verify future inspections and maintenance activities are documented electronically.

Per item B, Westgas will maintain and document costs of the safety improvements associated with this Compliance Order and will submit directly to your office once finalized.

Westgas Interstate appreciates the opportunity to address the concerns noted in the Notice of Probable Violation & Compliance Order letter. If you need any further information or clarification regarding this matter, please contact Nathan Gonzales at nathan.a.gonzales@xcelenergy.com.

Sincerely,

A handwritten signature in black ink that reads 'Lauren Gilliland'.

Lauren Gilliland
Senior Vice President, Gas