OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Responses required within **30 days of electronic mail.** Provide the following information for this report:

Response to Inspection Number: **EA25-041**

Type of Enforcement Action(s) cited in report:			Informal Conference Requested	
☒ Notice of Probable Violation (NOPV)	☐ New	☒ Continuing	☐ Yes	☒ No
☐ Notice of Amendment (NOA)	☐ New	☐ Continuing	☐ Yes	☐ No
☐ Warning Letter	☐ New	☐ Continuing	☐ Yes	☐ No
☐ Letter of Concern	☐ New	☐ Continuing	☐ Yes	☐ No
☐ Observed Issue	☐ New	☐ Continuing	☐ Yes	☐ No
☐ Proposed Civil Penalty	$		☐ Yes	☐ No

PCP $ Amount (Total for report)

Indicate below (A-E) based on the type of Enforcement Actions in this report: (Check all that apply)
Complete a separate copy of Page 2, Operator Response to Enforcement Action, for each cited item.

A. Response for **Notice of Probable Violation** (with and without proposed civil penalty):
   1. ☐ Written statement indicating that corrective measures have achieved Compliance or
   2. ☐ Written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated.

B. Response for **NOA**:
   1. ☐ Contested: Attach written explanation, information, or other material in answer to the allegations in the Notice of Amendment stating your reasons for objecting to the NOA, in whole or in part; or
   2. ☐ Not Contested: Explanation, information, or other material believed to warrant modification of the NOA in whole or in part; or
   3. ☐ Written request for clarification. (Attached)

C. Response for ☒ **Continuing** and/or **Existing** violations:
Current status, updates, expected completion dates, proposed modifications, etc., of the continuing and/or existing violations, even if this information was previously provided. Referencing a previously filed response letter, as status, updates, etc. alone is not sufficient for this response. Failure to provide this information may result in formal interrogatories from the Director through data requests.

D. Response for ☐ **Letter of Concern** / ☒ **Warning Letter**
I acknowledge receipt of the Letter of Concern/Warning Letter: Duran Powell Foreman
SIGNATURE / TITLE

Additional Comments: (Optional)

E. Response for **Observed Issue** and **No Violation**: (Optional Response)
Staff requests that the Operator acknowledge receipt of the Observed Issue/No Violation in writing, or by submitting an email to the FPU Director

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette

Docket Number: 37061

Enforcement Action for: §192.467 (c) ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette has cleared the shorted casing at Foster Mill Road and has advanced corrective actions for the remaining identified casing locations. The casing at Warren Road will be abandoned, while the casing at Park Street will be replaced through the installation of new steel natural gas mains via horizontal directional drilling. The existing carrier pipe and casing at these locations will be abandoned by grout fill.

These activities are covered under GDOT Utility Permit No. U-295-012865-6-RR. Engineering design for the remaining locations has been completed and is currently progressing through the permitting process. The City is in the final stages of permitting and will proceed with construction upon receipt of all required approvals.

Response Provided by: Shawn Powell Foreman Date: 4/21/06

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 d ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review

Response Provided by: Devon Rowda Foreman Date: 4/27/06

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 b ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Duran Rawls Foreman Date: 4/27/06

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.619a ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Duron Powell Foreman Date: 4/22/06

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.557 b 1 ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Duran Rowell Foreman Date: 4/27/06

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.605 (a) ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette provides the following update regarding this item. The City has reviewed and updated its procedures for the placement of distribution line valves in accordance with 49 CFR § 192.181(a). These updates define the criteria for valve placement and ensure that valve locations support effective emergency shutdown and pressure reduction.

Response Provided by: Duron Rowden Foreman Date: 4/22/26

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 (a) 1 ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE: The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Duron Powell Foreman Date: 4/27/06

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Responses required within **30 days of electronic mail.** Provide the following information for this report:

Response to Inspection Number: **JB26-002**

Type of Enforcement Action(s) cited in report:		Informal Conference Requested	
☒ Notice of Probable Violation (NOPV)	☐ New ☒Continuing	☐ Yes	☒ No
☐ Notice of Amendment (NOA)	☐ New ☐Continuing	☐ Yes	☐ No
☐ Warning Letter	☐ New ☐Continuing	☐ Yes	☐ No
☐ Letter of Concern	☐ New ☐Continuing	☐ Yes	☐ No
☐ Observed Issue	☐ New ☐Continuing	☐ Yes	☐ No
☐ Proposed Civil Penalty	$ PCP $ Amount (Total for report)		

Indicate below (A-E) based on the type of Enforcement Actions in this report: (Check all that apply)
Complete a separate copy of Page 2, Operator Response to Enforcement Action, for each cited item.

A. Response for **Notice of Probable Violation** (with and without proposed civil penalty):
   1. ☐ Written statement indicating that corrective measures have achieved Compliance or
   2. ☐ Written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated.

B. Response for **NOA**:
   1. ☐ Contested: Attach written explanation, information, or other material in answer to the allegations in the Notice of Amendment stating your reasons for objecting to the NOA, in whole or in part; or
   2. ☐ Not Contested: Explanation, information, or other material believed to warrant modification of the NOA in whole or in part; or
   3. ☐ Written request for clarification. (Attached)

C. Response for ☒ **Continuing** and/or **Existing** violations:
   Current status, updates, expected completion dates, proposed modifications, etc., of the continuing and/or existing violations, even if this information was previously provided. Referencing a previously filed response letter, as status, updates, etc. alone is not sufficient for this response. Failure to provide this information may result in formal interrogatories from the Director through data requests.

D. Response for ☐ **Letter of Concern** / ☒ **Warning Letter**
   I acknowledge receipt of the Letter of Concern/Warning Letter: Duran Rawlie Foreman
   SIGNATURE / TITLE

   Additional Comments: (Optional)

E. Response for **Observed Issue** and **No Violation**: (Optional Response)
   Staff requests that the Operator acknowledge receipt of the Observed Issue/No Violation in writing, or by submitting an email to the FPU Director

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 d ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review

Response Provided by: Duran Powder Foreman Date: 4/22/06

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 b ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Duron Rowell Foreman Date: 4/22/26

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.619a ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Duran Rowell Date: 4/22/26

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.557 b 1 ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Devon Rowell Date: 4/22/26

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.605 (a) ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette provides the following update regarding this item. The City has reviewed and updated its procedures for the placement of distribution line valves in accordance with 49 CFR § 192.181(a). These updates define the criteria for valve placement and ensure that valve locations support effective emergency shutdown and pressure reduction.

Response Provided by: Duran Powell Foreman Date: 4/27/06

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 (a) 1 ☐ New Violation ☒ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☒ Notice of Probable Violation (NOPV)	☐ Yes ☒ No	$ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE: The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Dawn Rowe Foreman Date: 4/27/06

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed: _____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed: ☐ Yes ☐ No Clear Violation: ☐ Yes ☐ No

Supervisor Review by: _____ Date Reviewed: _____

Additional Enforcement Recommended: ☐ Yes ☐ No

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments: _____