



March 13, 2012

Ms. Polly McDonald  
Director, Pipeline Safety Division  
Railroad Commission of Texas

Ms. McDonald:

Please find attached for your review and approval the Atmos Energy Mid-Tex Division's Distribution Facilities Replacement Completion Report and Distribution Facilities Replacement Work Plan pursuant to the requirements of Railroad Commission of Texas 16 TAC 8.209 Distribution Facilities Replacement rule.

The Atmos Energy Mid-Tex Division, in cooperation with the Railroad Commission of Texas, developed a steel service line risk model to assess steel service line risk and identify replacements. During the calendar year ending December 31, 2011, the Atmos Energy Mid-Tex Division replaced steel service lines under the agreement and risk model made in cooperation with the Railroad Commission of Texas and replaced other facilities based on an assessment of existing, known risk and in response to changing conditions that created risk as they presented themselves during the year (i.e. occurrence of leaks, newly identified threats). In total, the Mid-Tex Division replaced approximately 10,000 feet of steel main, 3,000 feet of cast iron main, and 40,000 steel service lines. The Distribution Facilities Replacement Completion Report detailing the distribution facilities replaced by the Mid-Tex Division during the calendar year ending December 31, 2011 is included as an enclosure to this correspondence.

During the calendar year ending December 31, 2012, the Atmos Energy Mid-Tex Division will continue to replace steel service lines under the agreement and risk model made in cooperation with the Railroad Commission of Texas and will continue to replace other facilities based on an assessment of existing, known risk and in response to changing conditions that create risk as they present themselves during the year. In total, the Mid-Tex Division plans to replace approximately 116,000 feet of steel main, 41,000 feet of cast iron main, and 45,000 steel service lines. The Distribution Facilities Replacement Work Plan outlining the facilities proposed for replacement by the Mid-Tex Division during the calendar year ending December 31, 2012 is included as an enclosure to this correspondence.

Atmos Energy recognizes that risk characterized in the Work Plan is defined by 'known' conditions that exist within facilities in the distribution system at the time the risk assessment is performed and the Work Plan is established. A risk model cannot quantify unknown, undiscovered or unranked risk. Atmos Energy will take into account these 'unknown' conditions in any given year as they present themselves and may retire or replace facilities in order to mitigate these risks.

We appreciate the opportunity to update the Railroad Commission on work completed in 2011 and your consideration of our replacement plans for 2012. We look forward to your response.

Sincerely,

Marc Chapman  
Director, Compliance, Mid-Tex

Enclosures (2)

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PIPELINE SAFETY DIVISION  
AUSTIN, TEXAS

# Distribution Facilities Replacement Reporting

*Atmos Energy Mid-Tex Division*

## ***Completion Report (2011)***

<b>Material</b>	<b>Distribution Piping (ft)</b>	<b>Service Lines (ea)</b>
Steel	10,045	40,410
Cast Iron	2,935	-
Copper	-	10
Plastic	-	3
<b>Grand Total</b>	<b>12,980</b>	<b>40,423</b>

## ***Work Plan (2012)***

<b>Material</b>	<b>Distribution Piping (ft)</b>	<b>Service Lines (ea)</b>
Steel	115,700	44,690
Cast Iron	41,400	-
<b>Grand Total</b>	<b>157,100</b>	<b>44,690</b>

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*\*Approximate Figures*

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AUSTIN, TEXAS

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# Distribution Facilities Replacement Completion Report (2011)

Atmos Energy Mid-Tex Division

Material	City	System ID	Distribution Piping (ft)	Service Lines (ea)
Steel	ABILENE	211069	1,572	3,940
Steel	ALBA	310012	-	1
Steel	ALLEN	610007	-	1
Steel	ALVARADO	610012	-	3
Steel	ARLINGTON	610023	-	1,259
Steel	ATHENS	310028	-	4
Steel	BALCH SPRINGS	611383	-	1
Steel	BALLINGER	211078	-	1
Steel	BARTLETT	410115	-	4
Steel	BEDFORD	610042	-	2
Steel	BELTON	410950	-	3
Steel	BENBROOK	611434	-	15
Steel	BENJAMIN	110880	-	1
Steel	BLANKET	611448	-	3
Steel	BLOOMING GROVE	310094	-	1
Steel	BLOSSOM	310095	-	1
Steel	BLUE RIDGE	612167	-	1
Steel	BONHAM	310101	-	3
Steel	BOWIE	610053	-	11
Steel	BREMOND	410978	-	1
Steel	BRIDGEPORT	610058	-	3
Steel	BROWNWOOD	611449	284	4
Steel	BRYAN	411071	769	4
Steel	BUFFALO	311779	-	1
Steel	BURKBURNETT	611451	-	1
Steel	BURLESON	610071	-	38
Steel	BURNET	410161	-	2
Steel	CALDWELL	411076	-	1
Steel	CAMERON	410940	-	4
Steel	CARROLLTON	610077	-	790
Steel	CELINA	610089	-	1
Steel	CENTERVILLE	310141	-	1
Steel	CHILDRESS	110099	-	14
Steel	CISCO	611460	685	-
Steel	CLARKSVILLE	310161	-	10
Steel	CLEBURNE	610103	-	1
Steel	CLIFTON	610107	-	4
Steel	COLLEGE STATION	411071	104	2
Steel	COMANCHE	611466	-	3
Steel	COMFORT	410209	-	1
Steel	COMMERCE	310168	-	282
Steel	COOPER	310174	-	1
Steel	COPPELL	610122	-	2
Steel	COPPERAS COVE	410945	-	238
Steel	CORSICANA	310177	-	1,084
Steel	DALLAS	610134	-	3,651
Steel	DAWSON	311780	-	2
Steel	DECATUR	610150	-	2
Steel	DENISON	610153	-	1,018
Steel	DENTON	610162	-	1
Steel	DEPORT	310239	-	1
Steel	DESOTO	610148	-	274
Steel	DUNCANVILLE	610180	-	654

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# Distribution Facilities Replacement Completion Report (2011)

Atmos Energy Mid-Tex Division

Material	City	System ID	Distribution Piping (ft)	Service Lines (ea)
Steel	EASTLAND	612219	-	50
Steel	ECTOR	310280	-	1
Steel	ELM MOTT	610189	-	1
Steel	ENNIS	610191	-	6
Steel	EULESS	610200	-	4
Steel	EVERMAN	612054	-	1
Steel	FAIRFIELD	311900	-	1
Steel	FARMERS BRANCH	610208	-	12
Steel	FARMERSVILLE	612203	-	1
Steel	FOREST HILL	612055	-	75
Steel	FORT WORTH	610226	-	4,895
Steel	FREDERICKSBURG	410285	-	1
Steel	GAINESVILLE	610237	-	1,178
Steel	GARLAND	610244	-	2,534
Steel	GATESVILLE	411038	-	4
Steel	GEORGETOWN	411289	-	2
Steel	GORMAN	611478	-	2
Steel	GRANBURY	610263	-	1
Steel	GRAND PRAIRIE	610265	-	97
Steel	GRANDVIEW	610266	-	1
Steel	GRANGER	410309	-	2
Steel	GREENVILLE	310388	-	794
Steel	GROESBECK	612001	-	5
Steel	GUSTINE	611479	-	1
Steel	HALTOM CITY	612026	-	2
Steel	HAMILTON	411119	-	1
Steel	HASKELL	110884	-	3
Steel	HILLSBORO	610288	-	5
Steel	HOLLAND	410339	-	1
Steel	HUBBARD	610293	-	2
Steel	HURST	610297	-	2
Steel	HUTCHINS	610298	-	1
Steel	HUTTO	411280	-	1
Steel	IOWA PARK	611484	-	1
Steel	IRVING	610304	-	1,150
Steel	JUSTIN	610321	-	1
Steel	KERENS	310503	-	1
Steel	KILLEEN	411048	-	2,960
Steel	LAKE WORTH	612669	-	5
Steel	LANCASTER	610341	-	3
Steel	LAWN	211108	-	1
Steel	LEWISVILLE	610350	-	2
Steel	LEXINGTON	410400	-	4
Steel	LITTLE RIVER-ACADEMY	410954	-	1
Steel	LLANO	410488	-	1
Steel	LONE OAK	310872	-	1
Steel	LONGVIEW	310882	-	1
Steel	LOTT	410981	-	2
Steel	MADISONVILLE	311631	-	1
Steel	MARLIN	410982	-	4
Steel	MCKINNEY	610969	-	7
Steel	MEGARGEL	611501	250	-
Steel	MERKEL	211113		1

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# Distribution Facilities Replacement Completion Report (2011)

Atmos Energy Mid-Tex Division

Material	City	System ID	Distribution Piping (ft)	Service Lines (ea)
Steel	MESQUITE	610980	-	3,190
Steel	MEXIA	610983	-	3
Steel	MILES	211114	-	1
Steel	N RICHLAND HILLS	612028	-	4
Steel	NEWCASTLE	611503	-	1
Steel	NOCONA	611016	-	1
Steel	NOLANVILLE	411050	-	2
Steel	NORMANGEE	311633	-	1
Steel	OLDEN	611510	400	-
Steel	OLNEY	611511	288	2
Steel	OSCEOLA	611039	-	1
Steel	PALESTINE	311008	-	2
Steel	PARIS	311017	845	4
Steel	PECAN GAP	311035	-	1
Steel	PLANO	611054	-	5
Steel	QUITMAN	311097	1,173	-
Steel	RANGER	611517	7	-
Steel	RICHARDSON	611083	-	1,534
Steel	RICHLAND HILLS	612027	-	4
Steel	RIVER OAKS	612670	-	2
Steel	ROCKDALE	410626	1,085	-
Steel	ROSEBUD	410943	-	1
Steel	ROWLETT	611105	-	1
Steel	ROXTON	311171	-	2
Steel	ROYSE CITY	611114	-	1
Steel	RULE	110905	-	1
Steel	SACHSE	611119	-	2
Steel	SAN ANGELO	211132	-	1,190
Steel	SANGER	611125	-	1
Steel	SANSOM PARK	612671	-	1
Steel	SEAGOVILLE	611387	-	1
Steel	SEYMOUR	611523	-	1
Steel	SHERMAN	611136	-	1,160
Steel	SNYDER	211139	-	7
Steel	STAMFORD	211478	482	-
Steel	STEPHENVILLE	611556	-	2
Steel	SULPHUR SPRINGS	311237	-	7
Steel	SWEETWATER	211142	-	2
Steel	TAYLOR	410708	-	6
Steel	TEMPLE	410955	-	34
Steel	TIOGA	611194	-	1
Steel	TOM BEAN	611195	-	2
Steel	TRAVIS	410944	-	2
Steel	TRENTON	311310	-	1
Steel	TYE	211152	-	2
Steel	UNIVERSITY PARK	612099	-	2
Steel	VERNON	611532	-	490
Steel	WACO	611218	-	2,246
Steel	WATAUGA	611229	-	1
Steel	WAXAHACHIE	611230	-	20
Steel	WEST	611240	-	1
Steel	WHITE SETTLEMENT	612673	-	1
Steel	WHITESBORO	611248	-	1

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## Distribution Facilities Replacement Completion Report (2011)

*Atmos Energy Mid-Tex Division*

Material	City	System ID	Distribution Piping (ft)	Service Lines (ea)
Steel	WHITEWRIGHT	611251	-	2
Steel	WICHITA FALLS	611539	1,950	3,274
Steel	WINGATE	211159	151	-
Steel	WINTERS	211160	-	1
<b>Steel Total</b>			<b>10,045</b>	<b>40,410</b>
Cast Iron	PARIS	311017	700	-
Cast Iron	UNIVERSITY PARK	612099	2,235	-
<b>Cast Iron Total</b>			<b>2,935</b>	<b>-</b>
Copper	FORT WORTH	610226	-	7
Copper	HALTOM CITY	612026	-	1
Copper	LAKE WORTH	612669	-	1
Copper	LAKESIDE	612668	-	1
<b>Copper Total</b>			<b>-</b>	<b>10</b>
Plastic	DESOTO	610148	-	2
Plastic	WHITE SETTLEMENT	612673	-	1
<b>Plastic Total</b>			<b>-</b>	<b>3</b>
<b>Grand Total</b>			<b>12,980</b>	<b>40,423</b>

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