

## Lyons Sara

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**From:** James Dortch <[REDACTED]>  
**Sent:** Wednesday, September 29, 2021 3:47 PM  
**To:** Lyons Sara  
**Subject:** RE: Information Request - Farmersville, TX (PLD21FR002) - FESCO flare system  
**Attachments:** Work Scope Contract.pdf

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Miss Sara,

Sorry it took so long to get this back to you but Chad Bacak (The person in contact with Atmos for the contract) was on vacation fishing with his son and then a golf tournament. Please let me know if there is anything else I can help you with.

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**From:** Lyons Sara [mailto:[REDACTED]]  
**Sent:** Friday, September 24, 2021 11:16 AM  
**To:** [REDACTED]  
**Subject:** Information Request - Farmersville, TX (PLD21FR002) - FESCO flare system

Jimmy,

In response to my previous request regarding the scope of work of contract activities performed on the day of the accident, FESCO indicated that: "Two FESCO employees were on an Atmos Energy location near Farmersville to bleed off the pigging launcher/trap through the FESCO flare stack."

On the day of the accident, a FESCO flare system (model FS-128-3) was connected to the pig launcher involved in the accident. Please answer the following questions regarding this equipment configuration and FESCO's responsibilities prior to the accident:

- Was the piping from the launcher to the flare system provided and installed by FESCO? If so, indicate when it was installed on location.  
[Yes, 6/21/2021](#)
- Was the flare system provided and installed by FESCO? If so, indicate when it was installed on location.  
[Yes, 6/21/2021](#)
- Did FESCO perform any evaluations to determine whether the configuration as installed would adequately depressurize the launcher prior to opening the launcher door?
  - If so, describe those evaluations and provide documentation.
  - If not, clarify whether such evaluations were FESCO's responsibility on this project. If documentation confirming your response is available, provide that documentation.  
[No, FESCO typically does not perform evaluations on depressurizations of pig launchers unless given a specific requirement from the customer based on either a time interval or acceptable gas rate allowable for the operation.](#)
- Did FESCO perform any evaluations to determine whether the configuration as installed would adequately remove natural gas from the launcher prior to opening the launcher door?
  - If so, describe those evaluations and provide documentation.
  - If not, clarify whether such evaluations were FESCO's responsibility on this project. If documentation confirming your response is available, provide that documentation.  
[No, FESCO's scope of work on this project did not include this provision.](#)

- Was FESCO provided the dimensions and valve configuration of the launcher prior to installing the flare system? If so, provide the documentation that was sent to FESCO, including who it was transmitted to, who it was from, and when it was sent.  
No, FESCO was only supplied a Work Scope Contract that included the overall length of the pipeline and the outside diameter of the pipe. Ref. pg 1, B. Length/Diameter.

Thanks in advance for your timely response.

-Sara

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**Sara Lyons, P.E.**

Pipeline Investigator/Investigator-in-Charge  
Office of Railroad, Pipeline and Hazardous Materials Investigations  
National Transportation Safety Board

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