



February 20, 2015

Mr. R M Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner, Suite 1110
Houston, Texas 77074

Dear Mr. Seeley:

Please accept this letter as the Cardinal Gas Storage Partners (Cardinal) PHMSA Audit (CPF 4-2014-1013M) response for Perryville and Cadeville Gas Storage, LLC.

Cardinal appreciates the level of review that PHMSA put into this audit and views these audit results as an opportunity for feedback from PHMSA and for improvement.

This audit found that Cardinal's Control Room Management:

1. Program does not detail the procedures for recording of tasks and the time each task was performed by the Controller. Cardinal must amend its procedure to ensure that the Controllers document their shift activities in the log sheet reflecting the actual time the activities took place.
2. Shift Turnover Procedure, Section 5, does not address the shift hand-over time frame between the controllers; so that both controllers have enough time to cover current conditions and upcoming events affecting the operation of the pipeline. Cardinal must amend the Control Room Shift Turnover Procedure to reflect the shift hand-over time frame so that both controllers have enough time to cover current conditions and any upcoming events affecting the operation of the pipeline.
3. Program does not include the time frame to conduct point-to-point verification when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays. Cardinal must amend its program to reflect the time frame to conduct point-to-point verification when field equipment is added or moved, and when other changes that affect pipeline safety are made to field equipment or SCADA displays.

Please accept the following responses to the three (3) alleged violations listed CPF 4-2014-1013M. Cardinal:

1. Will amend it's Control Room Management Procedure, "Will document, in time blocks (example, 6 – 9 am, 9 am – 12 pm, etc.) the tasks that were performed by the Controller."



2. Will amend its Control Room Management Procedure, Section 5, Shift Turnover Procedure to include the following-language:
 - a. "Under normal operations, The Controller Shift-Turnover form is completed as a new controller reports for duty. The day-shift turnover time normally begins at 6:00 am with the night-shift turnover normally beginning at 6:00 pm. The actual time it takes to complete a shift-turnover varies, based on the operating activity for the previous operating period and/or upcoming shift. In some cases it may take as little as 10 minutes and others as much as 30 minutes. The actual shift turnover time is recorded on the shift turnover form."
3. Will amend its Control Room Management Program to reflect the time frame to conduct Point-to-Point verifications:
 - a. All Point-to-Point Verifications shall be conducted in accordance with the following time frame:
 - i. Data points already being used by controllers shall be verified the same day the verification process became necessary.
 - ii. Data points being added or checked out as a part of a major system enhancement or replacement shall be verified before those data points are turned over to controllers for use.
 - iii. Point-to-Point verifications that cannot be completed as stated above must have safeguards in place that protect the portion of the pipeline system that these data points are monitoring and/or controlling. Such variances shall not be used to postpone the required verification; rather they may only be used to compensate for special operating and maintenance conditions. Furthermore, these variances may only be used when there is adequate SCADA monitoring and control to adequately compensate for such a variance. Any variance from the specified point-to-point verification timeframe must be approved by the Facility Manager prior to the variance being implemented.
4. Shall maintain adequate documentation to assure that these actions are documented in accordance with the recordkeeping requirements of 49 CFR 192.

As a company we are committed to a culture of business and operating practices that values the safety and health of the public, our employees and contractors. We are equally dedicated to sound environmental stewardship.



We look forward to working with PHMSA as we provide a valuable service to the natural gas transmission pipeline infrastructure and our stakeholders. Please contact me if you have any questions regarding this response or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Robt B Raines Jr.", written in a cursive style.

Robert B. Raines Jr.
Senior Vice President
Engineering and Operations
Cardinal Gas Storage Partners

A handwritten signature in black ink, appearing to read "Megan Tallent", written in a cursive style.

Megan Tallent
Director of Regulatory Affairs
Cardinal Gas Storage Partners