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**CERTIFIED MAIL**

January 10, 2019

Mr. Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
820 Bear Tavern Road, Suite 300  
West Trenton, NJ 08628

**RE: CPF 1-2018-0007W Warning Letter**

Dear Mr. Burrough:

This letter is the formal response by Dominion Energy Ohio (DEO) to the following alleged probable violations in Warning Letter 1-2018-0007W, dated November 23, 2018.

PHMSA Alleged Probable Violation

**1. §192.12 (d) Underground natural gas storage facilities.**

**(d) Each underground natural gas storage facility that uses a depleted hydrocarbon reservoir or an aquifer reservoir for gas storage, including those constructed not later than July 18, 2017 must meet the operations, maintenance, integrity demonstration and verification, monitoring, threat and hazard identification, assessment, remediation, site security, emergency response and preparedness, and recordkeeping requirements and recommendations of API RP 1171, sections 8, 9, 10, and 11 (incorporated by reference, see §192.7) by January 18, 2018.**

“DEO had not requested pertinent well data from the operators of 3<sup>rd</sup> party wells within the buffer zone of the Chippewa and Gabor Wertz storage fields as required by API RP 1171, Section 9.3.1. API RP 1171, Section 9.3.1, states in part “The operator shall request well integrity evaluation data from third-party well owner/operators following the frequency established using conclusions from the risk assessment.”

During the inspection at DEO’s office, DEO demonstrated that they had a template letter for requesting pertinent well data from operators of 3<sup>rd</sup> party wells. DEO stated that the template letter had not been updated with DEO’s information, nor sent to any operators of 3<sup>rd</sup> party wells within the buffer zone of the Chippewa and Gabor Wertz fields.”

**DEO Response:**

Per DEO's response to Mr. Aguirre on November 28, 2018 regarding this issue which was noted in the Post-Inspection Written Preliminary Findings Response (September 17, 2018), DEO has updated its letter template to include DEO's information. DEO also completed research to identify the owners/operators of third-party wells within the buffer zone of the Chippewa and Gabor Wertz fields. DEO sent letters to these owner/operators on November 1, 2018.

**PHMSA Alleged Probable Violation**

**2. §192.12 (d) Underground natural gas storage facilities.**

**(d) Each underground natural gas storage facility that uses a depleted hydrocarbon reservoir or an aquifer reservoir for gas storage, including those constructed not later than July 18, 2017 must meet the operations, maintenance, integrity demonstration and verification, monitoring, threat and hazard identification, assessment, remediation, site security, emergency response and preparedness, and recordkeeping requirements and recommendations of API RP 1171, sections 8, 9, 10, and 11 (incorporated by reference, see §192.7) by January 18, 2018.**

"DEO did not have records available of function tests, maintenance, repair and replacement of wellhead valves for the Chippewa and Gabor Wertz storage fields as required by API RP 1171, Section 9.3.2, and DEO's Storage Operating Well Head Valve Maintenance Procedure.

API RP 1171, Section 9.3.1, states in part "The operator shall test the operation of the master valve and wellhead pipeline isolation valve at least annually for proper function and ability to isolate the well. The valves shall be maintained, repaired, or replaced in accordance with the operator's valve maintenance program for isolation valves."

During the inspection at DEO's office, DEO stated that the system for recordkeeping of function tests, maintenance, repair and replacement of wellhead valves was in the process of implemented."

**DEO Response:**

Per DEO's response to Mr. Aguirre on November 28, 2018 regarding this issue which was noted in the Post-Inspection Written Preliminary Findings Response (September 17, 2018), at the time of the inspection, DEO was in the process of developing an electronic recordkeeping system for master valve and wellhead pipeline isolation valve inspection. DEO has completed and implemented the electronic recordkeeping system. Documentation of inspections and maintenance began in October 2018. The 2018 inspections were completed by December 31, 2018.

**3. §192.12 (d) Underground natural gas storage facilities.**

**(d) Each underground natural gas storage facility that uses a depleted hydrocarbon reservoir or an aquifer reservoir for gas storage, including those constructed not later than July 18, 2017 must meet the operations, maintenance, integrity demonstration and verification, monitoring, threat and hazard identification, assessment, remediation, site security, emergency response and preparedness, and recordkeeping requirements and recommendations of API RP 1171, sections 8, 9, 10, and 11 (incorporated by reference, see §192.7) by January 18, 2018.**

“DEO did not have records available of training for personnel at the Chippewa and Gabor Wertz storage fields as required by API RP 1171, Section 11.13.2.

API RP 1171, Section 11.13.2, states in part “The operator shall maintain records that demonstrate compliance with this subsection.”

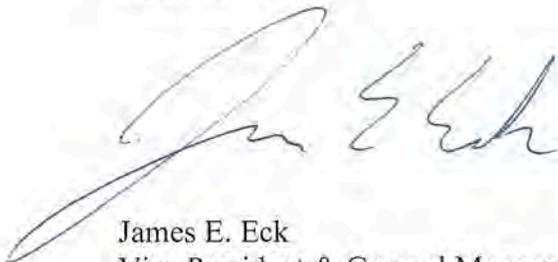
During the inspection at DEO’s office, DEO stated that the system for recordkeeping of training was in the process of being implemented.”

**DEO Response:**

At the time of the inspection, DEO had training records available and presented copies of these records during the same inspection. These records included scans of signed training rosters of various training sessions that were conducted.

If you have any questions or need additional information, please do not hesitate to contact me.

Respectfully,



James E. Eck  
Vice President & General Manager  
Dominion Energy Ohio & West Virginia Distribution