



RECEIVED MAY 13 2019

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Casper, WY 82601  
307-315-7860

May 7, 2019

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

RE: Notice of Amendment – April 11, 2019  
CPF 1-2019-0007M

Dear Mr. Burrough:

This letter is in response to your Notice of Amendment letter, dated April 11, 2019. There were three items noted.

Each item requiring amendment in the letter is first restated below and is then followed by Black Hills Energy's response in bold font.

Notice of Amendment – PHMSA Underground Natural Gas Storage Inspection letter:

1. Violation: "BHE procedures did not define a threshold level for annular pressure or flow as required"

**Black Hills Energy's Response:**

**BHE will update its procedures and forms to indicate a threshold for annular gas pressure which will begin an investigation process.**

2. Violation: "BHE's Emergency Response Plan did not address equipment failures, natural disasters, and third-party emergencies"

**Black Hills Energy's Response:**

**BHE will amend its manuals to address these items specifically.**

3. Violation: "BHE had not developed procedures for interaction with the control room"

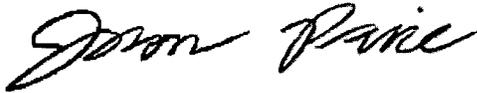
**Black Hills Energy's Response:**

**BHE will amend its current Control Room Management Manuals to address Underground Storage specific items.**

In Conclusion:

Black Hills Energy appreciates the work of the Pipeline and Hazardous Materials Safety Administration. We will be sending you the required updated manuals within the 60 day window. If you have any questions regarding the matters covered in this letter, or if further follow-up is required, please call or email Jason Price, Program Manager SIMP, at 307-315-7860, email is Jason.Price@blackhillscorp.com.

Sincerely,



Jason Price  
Program Manager, SIMP

cc:

Chad Kinsley  
Junior Bowen  
Brian Kretz  
Marc Lewis  
John Hill  
Dari Dornan  
Bill Stephens  
Brad Samuels  
Thomas Warnes  
Corey Koca