



CERTIFIED MAIL

May 14, 2020

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

RE: CPF 1-2020-5006W Warning Letter

Dear Mr. Burrough,

This letter is a formal response by Dominion Energy Transmission, Inc. (DETI) to the following alleged probable violation contained in Warning Letter CPF 1-2020-5006W, dated April 7, 2020.

1. § 195.420 Valve Maintenance

(a) Each operator shall maintain each valve that is necessary for the safe operation of its pipeline systems in good working order at all times.

Dominion failed to maintain a valve that is necessary for safe operation of its pipeline systems in good working order at all times. Specifically, a vapor leak was evident at Dominion's Lower Run Gate Valve (GA-20) at the time of the inspection and was identified as having been present for approximately one month.

During the field inspection on July 16, 2019, the PHMSA inspector observed a vapor leak at GA-20 on the isolation valve between the launcher/receiver trap and the main line. When Dominion was questioned about the vapor leak, the response was that there had been an on-going problem with leakage since the valve was installed and pressurized approximately one month prior. Dominion then stated that the line was scheduled for blow down within a week, and the repair or replacement would be attempted at that time. This

demonstrates that Dominion was aware of the condition of the valve but neither disclosed it to PHMSA nor took steps to immediately mitigate the leak.

Therefore, Dominion failed to maintain its isolation valve at GA-20 in safe working order at all times, as required by § 195.420 (a).

DETI Response:

The valve identified in the warning letter is an isolation valve between the receiver barrel and the flare stack, not between the receiver and the mainline as described in the warning letter. This valve is operated during pigging operations to allow any propane that was brought into the receiver to be safely flared. The valve meets the requirements of 195.420 (a) since the valve was still fully functional for its intended purpose of opening to the flare.

The leaking valve was not determined to be an emergency or safety risk to employees or the public; therefore, it was not reported as a Safety Related Condition. DETI's standard operating procedure is to leave the receiver barrel open to the pipeline to prevent the receiver from increasing in pressure due to thermal expansion. The barrel could have been isolated if the valve leak was deemed to be a safety risk. DETI provided evidence to PHMSA that the valve had been replaced.

It is DETI's position that the subject valve met the requirements of 195.420 (a) - it was still operable and was not a safety concern. From our perspective, we do not see this item as a non-compliance.

If you have any questions, concerns, or requests for additional information, please do not hesitate to contact Dan Stahl at (681) 842-3365.

Respectfully,



John M. Lamb
Vice President, Eastern Pipeline Operations
Dominion Energy Transmission, Inc.