



DELTA NATURAL GAS COMPANY, INC.

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January 18, 2022

Mr. Robert Burrough
Director Eastern Region
Pipeline and Hazardous Materials Safety Administration

Re: CPF 1-2021-071-NOA

Dear Mr. Burrough:

This information is being provided as a response to your Notice Of Amendment letter dated December 29, 2021 with regard to the records and field inspection of Delta Natural Gas Company, Inc.'s (DNG) Canada Mountain Storage Field, located in Bell County, Kentucky that was conducted by Mr. Brian Gistand from March 22, 2021 to March 26, 2021.

Based upon the preliminary findings and notification from PHMSA that DNG's written procedures did not describe the process for evaluating each annular gas occurrence that exceeds operator or regulatory defined threshold levels in accordance with API RP 1171, Section 9.3.2), DNG elected to proceed proactively with the modification of the Storage Field Integrity Management Plan (SFIMP) and thus amend the Risk Mitigation section of the plan to detail the said process. The amended risk mitigation procedure / response resulting from excessive annular gas pressure above the established threshold level is shown below with the section amendments displayed in green for your review.

DNG is very appreciative of your efforts with regard to this Notice Of Amendment letter and we look forward to your review and additional comments. Please feel free to contact me at your convenience with any additional needs that you may have.

Respectfully,

Craig Mitchell

Craig Mitchell
Regulatory Compliance Engineer
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