

## NOTICE OF AMENDMENT

### OVERNIGHT EXPRESS DELIVERY

April 7, 2022

Mr. P. Rodney Blevins  
President, Gas Distribution  
Dominion Energy Ohio  
120 Tredegar Street  
Richmond, Virginia 23219

CPF 1-2022-026-NOA

Dear Mr. Blevins:

From June 23, 2020 to June 25, 2020, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Dominion Energy Ohio's (DEO) procedures for construction in North Canton, Ohio.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within DEO's plans or procedures, as described below:

1. **§ 192.12 Underground natural gas storage facilities.**
  - (a) . . .
  - (c) ***Procedural manuals.*** Each operator of a UNGSF must prepare and follow for each facility one or more manuals of written procedures for conducting operations, maintenance, and emergency preparedness and response activities under paragraphs (a) and (b) of this section. Each operator must keep records necessary to administer such procedures and review and update these manuals at intervals not exceeding 15 months, but at least once each calendar year. Each operator must keep the appropriate parts of these manuals accessible at locations where UNGSF work is being performed. Each operator must have written procedures in place before commencing operations or beginning an activity not yet implemented.

DEO's written procedures for conducting activities were inadequate to ensure safe operation of a

pipeline facility in accordance with § 192.12(c). Specifically, DEO's *Storage Integrity Management Program (Well and Reservoir)*, Well Integrity Standard, updated 7/10/2020 (SIMP), failed to provide sufficient details for performing production casing pressure tests pursuant to API RP 1171, Section 6.9.1 (Section 6.9.1).<sup>1</sup>

During the inspection, PHMSA reviewed DEO's SIMP, subsection S30.7. That subsection repeated the exact language of Section 6.9.1, including the details of commonly used test parameters for pressure and duration as shown in the example provided in Section 6.9.1. However, the SIMP did not include additional details for performing production casing pressure tests, such as the appropriate test pressure and duration so that the maximum pressure on the packer seat and the pressure at any point in the wellbore during the test does not compromise the mechanical integrity of the well.

Therefore, DEO's written procedures for conducting activities were inadequate to ensure safe operation of a pipeline facility in accordance with § 192.12(c). DEO must revise its SIMP to include the required details for performing production casing pressure tests, such as the appropriate test pressure and duration, as required by Section 6.9.1.

### Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Enforcement Proceedings.

Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an

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<sup>1</sup> *API RP 1171, 6.9.1 Testing Methods*

A new well, or a well that has had its existing production casing modified from its previous condition during workover activities, shall be tested to demonstrate mechanical integrity and suitability for the designed operating conditions prior to commissioning by one of the following tests.

- a) For new well construction, the production casing shall be tested prior to drilling out the shoe, taking into account the cement design factors so that this test does not compromise the cement integrity.
- b) For existing production casing, the production casing shall be tested after setting a retrievable plug as close as practical to the top of the storage formation.

NOTE A commonly used test parameter is an initial test pressure of 1.1 times the maximum allowable operating pressure, with test duration of at least 30 minutes and a pressure drop not exceeding 10% of the initial test pressure. Applicable regulations may stipulate other parameters.

- c) For a well completed with tubing and packer, the tubing-casing annulus shall be tested.

The operator shall design a test so the maximum pressure on the packer seat and the pressure at any point in the wellbore during the test does not compromise the mechanical integrity of the well.

explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Dominion Energy Ohio maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. In correspondence concerning this matter, please refer to **CPF 1-2022-026-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible. Smaller files may be emailed to [robert.burrough@dot.gov](mailto:robert.burrough@dot.gov). Larger files should be sent on USB flash drive accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings