

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



April 26, 2022

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

CPF 1-2022-026-NOA

**Subject: Notice of Amendment Response, April 7, 2022**

Dear Mr. Burrough:

This letter is in response to the Notice of Amendment dated April 7, 2022 ("the Notice"), concerning the construction inspection conducted by Pipeline and Hazardous Materials Safety Administration (PHMSA) between June 23, 2020, and June 25, 2020. The following information is provided for PHMSA's review and consideration in response to the procedural inadequacy identified in the letter.

The Identified Procedural Inadequacies with Dominion Energy Ohio's ("Dominion" or "DEO") Storage Integrity Management Program:

**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>

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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.

### **Dominion Energy Ohio's Response**

Dominion is not contesting the Notice of Amendment. In response to the Notice, DEO has updated and made procedural enhancements to its Mechanical Integrity Testing Guidelines procedure. Please find attached a copy of the amended procedure with highlighted text indicating the enhancements made. In addition, DEO is adding this procedure to the SIMP S30 appendix. This procedure is currently in the Management of Change (MOC) process. Dominion anticipates implementing the new procedures by May 31, 2022.

If you have any questions or need additional information, please contact Mr. Ron Morrow, Pipeline Integrity Program Manager, 330-575-8439.

Sincerely,



P. Rodney Blevins  
President  
Dominion Energy Gas Distribution

Exhibit:

1. Mechanical Integrity Testing Guidelines Procedure (revised 4-21-2022)

cc: Jim Eck  
Leighton McCoy  
Frank Martin  
Jeff Hansen  
Allison Walters-Thompson