



10 Executive Drive
Collinsville, Illinois 62234

May 26, 2022

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

SENT VIA EMAIL

Subject: Response to CPF 1-2022-045-NOA

Dear Mr. Burrough:

This letter is in response on behalf of Ameren Illinois Company (AIC) to your letter dated April 26, 2022, regarding Inspection # CPF 1-2022-045-NOA where PHMSA identified two Notices of Amendments (NOA) related to an Illinois Department of Natural Resources audit from April 19, 2021, through April 23, 2021 of AIC's Lincoln Underground Natural Gas Storage Facility (UNGSF) in Logan County, Illinois;

AIC submits the following responses and revised procedures to address these Notices of Amendment.

1. Item 1 [192.12 (b)(2) with reference to API RP 1171, Section 11.2.1 – Construction, Operation, and Maintenance Procedures]

PHMSA indicated that "AIC's written procedures were inadequate to assure safe operation of a pipeline facility. Specifically, AIC's procedures required by API RP 1171, Section 11.2.1 - Construction, Operation, and Maintenance Procedures (Section 11.2.1) were inadequate for the storing, transporting, lifting, and installing of piping pursuant to API RP 1171, Section 6.3.6 - Handling (Section 6.3.6)."

Section 11.2.1 requires that "the operator shall develop and follow procedures for the construction, operation, and maintenance of natural gas storage wells and reservoirs to establish and maintain functional integrity." Section 6.3.6 states in part that the "casing shall be stored, transported, lifted and installed as specified by the manufacturer and in accordance with API 5C1."

PHMSA indicated that AIC was not able to provide procedures or records to verify that casing was stored, transported, lifted, and installed as specified by the manufacturer and in accordance with API 5C1 and according directed that AIC must revise its procedures to address the deficiency.

RESPONSE TO ITEM 1

Since the time of the inspection, AIC has implemented revised procedures to address the concern in Item 1, included as Attachments 1 through 3 of the response as follows:

- Attachment 1 – Titled "**API RP 5C1 Tubular Handling and Transportation Checklist**" is a form which has been incorporated into procedures to address the documentation of the items specified in API RP 5C1 to ensure the captured information is recorded and documented during the handling and transportation of tubulars. The handling and transportation forms have been provided to the tubing supplier to track the handling of tubulars from the mill to our Gas Storage facilities when acquiring new tubulars. The form also addresses the handling of existing tubing which is pulled out of a well and subsequently reused.
- Attachment 2 – Titled "**API 1171 6.3 Requirements for Well Casing**" was added to AIC Operations and Maintenance Plan procedures effective 4/26/2021. The added procedure requires the documentation of the items specified in API RP 5C1 to ensure the information is captured by recording and documenting the installation of tubulars. During the installation of the tubing, this inspection form is completed to show that the tubing was visually inspected at the time of the installation.
- Attachment 3 – Titled "**Ameren Illinois Well Packet for well Work IPC #1 Workover**" includes a completed well work procedure and provides a post implementation example of utilizing the new procedures when tubing is installed into a well. During these operations the steps identified in API 5C1 were incorporated into the procedure, which includes copies of the completed forms filled out during the operations and maintenance activities. This procedure also contains the Environmental, Safety and Health form completed daily during well work operations.

2. Item 2 [192.12 (b)(2) with reference to API RP 1171, Section 6.8.1 – Design and Construction Safeguards]

PHMSA indicated that "AIC's written procedures were inadequate to assure safe operation of a pipeline facility. Specifically, AIC's procedures required by API RP 1172 Section 11.2.1 were deemed inadequate regarding safeguards to the environment, safety, and health of workers and the public pursuant to API RP 1171, Section 6.8.1 – Design and Construction Safeguards."

Section 6.8.1 states in part that "safeguards to the environment, safety, and health of workers and the public shall be incorporated into well design and well work activities."

PHMSA indicated that AIC was not able to provide procedures or records that identified and enforced safeguards to the environment, safety and health of workers and the public prior to well workover on Worthington Homey in 2020 and Roller in 2019. Specifically, that no measures were demonstrated to have been taken to detect and mitigate H2S gas which was known to be present within the wells in this

field. During the time of the audit AIC provided a draft form, Well Work Environmental Safety Checklist, to incorporate for future records.

PHMSA therefore indicated that AIC must revise its procedures to address the deficiency noted above."

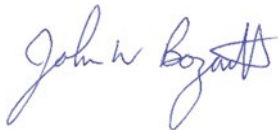
RESPONSE TO ITEM 2

Since the time of the inspection, AIC has implemented revised procedures to address the concerns raised in Item 2, included as Attachments 3 through 5 of the response as follows:

- Attachment 3 – Titled "**Ameren Illinois Well Packet for Well Work IPC #1 Workover**" includes a well work procedure and provides a post implementation example of utilizing the new procedures. This procedure contains the Environmental, Safety and Health form completed daily during well work operations.
- Attachment 4 – Titled "**Gas Operating & Maintenance Plan Design, Construction Storage Wells Environmental, Safety and Health**" was added to AIC Operations and Maintenance Plan procedures with the latest version effective 3/28/2022. This procedure establishes an environmental safety plan that will be used for pre and post on site well work operations to ensure the safety and health of workers and the public. The procedure references the procedure and checklist included in Attachment 5.
- Attachment 5 – Titled "**Well Work Environmental Safety Checklist**" was added to AIC Operations and Maintenance Plan procedures effective 5/07/2021. The procedure establishes an environmental safety plan that will be used for pre, during, and post on site well work operations to ensure the safety and health of workers and the public.

Please contact me at 217-625-6854 if there are any additional questions or clarifications related to these revised procedures.

Sincerely,



John Bozarth
Director, Pipeline Safety & Quality Management

CC: Richard Mark, Dave Wakeman, Brad Kloeppel, Stephen Underwood