

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

June 2, 2022

Ms. Colleen Larkin Bell
President and Chief Executive Officer
MountainWest Pipeline, LLC
P. O. Box 453360
Salt Lake City, Utah 84145

CPF 1-2022-054-NOA

Dear Ms. Larkin Bell:

From June 2, 2021 through June 4, 2021, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the underground natural gas facility procedures of MountainWest Pipeline, LLC's¹ (MWP) Leroy Storage in Salt Lake City, Utah.

On the basis of the inspection, PHMSA has identified an apparent inadequacy found within MWP'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

¹ At the time of the inspection, the operator of the Leroy Storage was known as Dominion Energy Questar Pipeline, LLC. Dominion Energy Questar Pipeline, LLC and associated assets were acquired by South West Gas Holding Company on January 1, 2022. As part of the acquisition the company name was changed on April 1, 2022 to MountainWest Pipeline, LLC.

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.

MWP's written procedures for conducting operations, maintenance, and emergency preparedness and response activities were inadequate to ensure safe operation of a pipeline facility. Specifically, MWP failed to include in its manuals a procedure for determining that the ground water and hydrocarbon zones were sealed off prior to plugging and abandoning a well pursuant to API RP 1171, Section 6.7.2 (Section 6.7.2), as required by API RP 1171, Section 11.2.1 (Section 11.2.1).

Section 11.2.1 states in relevant part that "[t]he 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 6.7.2 states in relevant part:

The operator shall use cement plugs (see 6.4.3) and/or mechanical plugs to isolate the storage zone from fluid migration. The use of hydrostatic pressure as a sole means of isolation shall not be acceptable... The operator shall determine the location of groundwater and hydrocarbon bearing zones (in addition to the storage zone) penetrated by the well to be abandoned, and the condition of the well's casing and cement across those zones, to prevent communication between any of those zones during and after plugging of the well. Special provisions may be necessary to isolate formations behind uncemented casing.

During the inspection, PHMSA reviewed procedures and records relative to the plugging and abandoning of MWP's well Leroy #5. MWP was not able to provide current or prior procedures addressing verification that the ground water and hydrocarbon zones were identified prior to plugging and abandoning or sealed off so that migration of fluids would not occur.

Therefore, MWP's written procedures were inadequate. MWP must revise its procedures to address Section 6.7.2 requirements when plugging and abandoning a well.

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 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 MountainWest Pipeline, LLC 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 1-2022-054-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. 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