



June 22, 2022

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

CPR 1-2022-054-NOA

**Subject: Notice of Amendment Response, June 2, 2022**

Dear Mr. Burrough:

This letter is in response to the Notice of Amendment dated June 2, 2022 (“the Notice”), concerning the inspection conducted by Pipeline and Hazardous Materials Safety Administration (PHMSA) between June 2, 2021 through June 4, 2021. The following information is provided for PHMSA’s review and consideration in response to the procedural inadequacy identified in the letter.

**Notice of Amendment**

The Notice of Amendment dated June 2, 2022, described the procedural inadequacies identified by PHMSA as follows:

**The Identified Procedural Inadequacies with the MountainWest Pipeline’s (“MWP”) 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.**

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.

### **MountainWest Pipeline's Response**

MountainWest Pipeline is not contesting the Notice of Amendment. In response to the Notice, MWP has updated and made procedural enhancements to its S33 Well Workover Standard, its related S33A Well Workover Appendix, and incorporated the use of its Gas Storage – Project Checklist (Plug and Abandonment) procedure. The Gas Storage – Project Checklist (Plug and Abandonment) procedure will be required to be filled out by the project engineer and then signed off from a technical reviewer. Within this checklist under 6.7.2 Storage Zone Isolate the 2<sup>nd</sup> item specifically addresses the requirement for the well specific workplan to list all groundwater and hydrocarbon bearing zones penetrated by the well to be abandoned. Please find attached copies of the amended procedures with redlined text indicating the enhancements made and the newly incorporated Checklist. The procedure enhancements have been made following the Management of Change (MOC) process which includes training on the amended procedures. These modifications were implemented as of June 21, 2022.

If you have any questions or need additional information, please contact Mr. Jacob Abraham, Engineer III  
– Storage Reservoir Engineering, 801-647-7065.

Sincerely,

*Colleen Larkin Bell*

Colleen Larkin Bell  
President  
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Exhibit:

1. SIMP Standard 33: Well Workover
2. SIMP Standard 33A Appendix: Well Workover
3. Gas Storage – Project Checklist (Plug and Abandonment)

cc: Lori Creer  
Stewart Merrick  
Doug Brunt  
Jared Stradley