



**ORBIT** GAS TRANSMISSION, INC.



1401 Spring Bank Dr., Suite 16, Owensboro, KY 42303  
270-302-6431

September 6, 2022

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

RE: Notice of Amendment: CPF 1-2022-065-NOA

Dear Mr. Burrough:

This is in response to the subject notice to Orbit dated August 18, 2022 with responses due no later than September 17, 2022 (30 days).

Clarification: The letter addressed to me said "President, Century Aluminum". I am President of Orbit Gas Transmission, Inc. who is the "operator-of-record" for Century Aluminum, the owner of the storage asset.

### **NOA 1**

**RE: API RP 1171, Section 9.3.2: "the operator shall monitor for presence of annular gas measuring and recording annular pressure and/or annular gas flow."**

The inspection results indicate Century Aluminum's SIMP plan was reviewed and did not include provisions for measuring and recording annular pressure and/or annular gas flow.

Orbit Response: Orbit discussed this issue with the PHMSA inspection team and described that all four storage wells do not produce through tubing and this is described in the SIMP plan Sec. 2.4 and is shown in the well drawings in Appendix 1 of the SIMP plan. The wells produce through the casing and therefore an "annulus" does not physically exist. If Century ever installs tubing and packers for production and an annulus is thereby created, Orbit will amend the SIMP plan and add procedures per the subject regulation.

### **NOA 2**

**RE: API RP 1171, Section 9.3.2: "the operator shall test the operation of the master valve and wellhead pipeline isolation valve at least annually for proper function and ability to isolate the well."**

The inspection results indicate Century Aluminum's SIMP plan was reviewed and failed to establish an annual frequency requirement for testing of the operation of the master valve and wellhead isolation valve for proper function and ability to isolate the well.

Orbit Response: A wellhead sketch of the wells is provided in Appendix 2 of the SIMP plan: It shows no master valves on the wells, only a wellhead isolation valve. These well valves are also shown in the SIMP Figure 2.1B. Century's SIMP plan in Section 2.5 references comprehensive procedures to ensure safe and reliable operations that are per Orbit's Operations and Maintenance Manual and that manual was provided to the inspection team. The SIMP plan identifies in its ERP Section 1.3 each wellhead valve as key valves. Orbit's O&M manual page 5 states it applies to the Century (CAS) storage field and Section 3.14 describes the testing of those valves and timing (intervals not exceeding 15 months, but at least once each calendar year). Annual test records of these valves for 2019, 2020 and 2021 were provided to the inspection team via email on 12-9-21.

### NOA 3

**RE: API RP 1171, Section 9.3.2: "the operator shall evaluate each annular gas occurrence that exceeds operator- or regulatory-defined threshold levels determined from well integrity evaluation and from risk assessment."**

The inspection results indicate Century Aluminum's SIMP plan was reviewed and did not include a process for determining threshold levels from well integrity evaluation and from risk assessment. The SIMP also failed to include a process for evaluating each annular gas occurrence that exceeds operator- or regulator-defined thresholds.

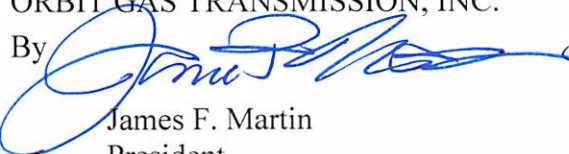
Orbit Response: Orbit discussed this issue with the PHMSA inspection team and described that all four storage wells do not produce through tubing and this is described in the SIMP plan Sec. 2.4 and is shown in the well drawings in Appendix 1 of the SIMP plan. The wells produce through the casing and therefore an "annulus" does not physically exist. Therefore, an annular gas occurrence cannot physically ever develop and a threshold is moot. If Century ever installs tubing and packers for production and an annulus is thereby created, Orbit will amend the SIMP plan and add procedures per the subject regulation.

I sincerely hope the above addresses PHMSA's concerns with Century's plans and procedures managed my Orbit. Please advise if more clarification is needed on any of these issues.

Very truly yours,

ORBIT GAS TRANSMISSION, INC.

By



James F. Martin  
President