



February 20, 2015

Mr. R M Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 South Gessner, Suite 1110
Houston, Texas 77074

Dear Mr. Seeley:

Please accept this letter as the Perryville Gas Storage, LLC (Perryville) PHMSA Audit (CPF 4-2014-1011W) response.

Perryville appreciates the level of review that PHMSA put into this audit and views these audit results as an opportunity for feedback from PHMSA and for improvement.

This audit found that Perryville did not follow its Control Room Management procedure for conducting the operating experience review training on lessons learned. While the CPF 4-2014-1011W does not require a response, I wanted to review with you the actions that we have taken.

As we communicated in the audit, we do conduct these reviews during our monthly safety meetings. The results of the audit have identified that our documentation is lacking, therefore we have taken the necessary steps to assure that Perryville:

1. Follows its Control Room Management Program.
2. Will re-conduct and document its review of the two Abnormal Operating Conditions (AOC's) cited in this audit and will conduct the operating experience review training with its "Controllers" on lessons learned.
3. Will investigate / review future AOC's, Safety Related Conditions, Incidents, emergencies or other events that Perryville identifies as significant, in accordance with company procedures, and conduct the operating experience review training on lessons learned (as needed).
4. Will conduct follow-up "Controller CRM Training" as specified in Cardinal's CRM Program Requirements, including but not limited to, operating experience review training on lessons learned.
5. Will maintain adequate documentation to assure that these actions are documented in accordance with the recordkeeping requirements of 49 CFR 192.



As a company we are committed to a culture of business and operating practices that values the safety and health of the public, our employees and contractors. We are equally dedicated to sound environmental stewardship.

We look forward to working with PHMSA as we provide a valuable service to the natural gas transmission pipeline infrastructure and our stakeholders. Please contact me if you have any questions regarding this response or require additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Robt B Raines Jr.", written in a cursive style.

Robert B. Raines Jr.
Senior Vice President
Engineering and Operations
Cardinal Gas Storage Partners

A handwritten signature in black ink, appearing to read "Megan Tallent", written in a cursive style.

Megan Tallent
Director of Regulatory Affairs
Cardinal Gas Storage Partners