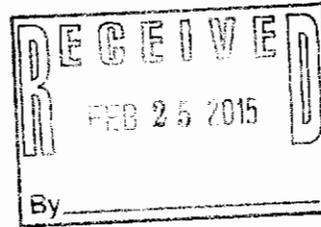




February 20, 2015



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 Cadeville Gas Storage, LLC (Cadeville) PHMSA Audit (CPF 4-2014-1012W) response.

Cadeville 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 Cadeville failed to properly maintain a method of recording shift-changes process between the outgoing and incoming controllers. Specifically, the audit found that the Cadeville turnover log sheets for 2013 and 2014 do not show the actual time the shift turn over took place between the Controllers. Instead, Controllers simply noted "Days" or "Night" in the turnover log sheet.

While the CPF 4-2014-1012W does not require a response, I wanted to review with you the actions that we have taken.

Cadeville:

1. Now documents the specific time the shift turnover occurs between the outgoing and incoming Controllers.
2. Will amend it's Control Room Management Procedure, Section 5, Shift Turnover Procedure to include the following-language:
 - a. "Under normal operations, The Controller Shift-Turnover form is completed as a new controller reports for duty. The day-shift turnover time normally begins at 6:00 am with the night-shift turnover normally beginning at 6:00 pm. The actual time it takes to complete a shift-turnover varies, based on the operating activity for the previous operating period and/or upcoming shift. In some cases it may take as little as 10 minutes and others as much as 30 minutes. The actual shift turnover time is recorded on the shift turnover form."
3. Maintains 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 "Rob B Raines".

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".

Megan Tallent
Director of Regulatory Affairs
Cardinal Gas Storage Partners