



NGO Transmission, Inc.
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August 6, 2020

Mr. Robert Burrough
Director, Eastern District
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

VIA EMAIL

Re: Response to Warning Letter CPF 1-2020-1018W

Dear Mr. Burrough:

First, let me express appreciation for the extension granted to respond to the Warning Letter dated April 30, 2020. NGO Transmission, Inc. (NGO) hereby submits the following responses:

- 1. During the inspection, records failed to demonstrate that appropriate data was used for the Cotterman wellsite assessment within the Perry storage field. The Cotterman well-site was assessed as a low risk well, however there was no data to support the low risk assessment.**

Response: As previously discussed regarding comparable issues raised in the accompanying Notice of Amendment, the existing risk model is being re-evaluated to ensure that well and reservoir assessments adequately consider all existing data sources and potential threats while also ensuring that weighting coefficients and calculation methods are best calibrated against historical risk data and assessments. This effort, which is ongoing and will be routine going forward, will not only address the concern raised in this warning but also improve the efficacy of the risk model as a whole.

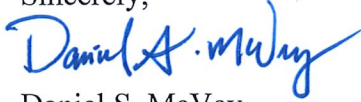
- 2. During the inspection, it was established that NGO's program requires annual evaluation of the ER Plan for effectiveness. However, NGO failed to produce records demonstrating that the ER Plan was evaluated for effectiveness in 2018.**

Response: The existing NGO Emergency Preparedness and Response Effectiveness standard outlines the need for plan revaluation on a two year cycle through exercises designed to ensure storage employee proficiency in emergency

assignments and to verify the validity of the plan. Due to the timing of implementation of this standard, such evaluation may not have been available for the specific reporting year of 2018. However, in future years under the defined two year cycle, such evaluations will be performed and the accompanying documentation of the associated results will be recorded.

If you require any additional information or have any comments, please contact me at your convenience.

Sincerely,



Daniel S. McVey
Vice President/COO

cc: Don Wheeler, Operations Manager