



James M. Hotinger, PE
Director, Regulatory
Compliance

6679 Highland Ave.
Beaumont, Tx. 77705
(804) 966-3146 tel
(804) 514-7954 cell
JHoting@southernco.com

Robert Burrough
Director, Eastern Region
DOT/PHMSA/OPS
840 Bear Tavern Road
Suite 300
West Trenton, NJ 08628

REFERENCE: CPF 1-2021-006-NOA

Dear Mr. Burrough

The following information is provided in response to the Notice of Amendment (NOA), CPF-1-2021-006-NOA, dated March 11, 2021, and the four (4) inadequacies relative to the written procedures for Golden Triangle Storage (GTS) noted in the NOA. These inadequacies are related to an inspection of GTS's plans and procedures on March 17-18, 2020 and October 14, 2020 for compliance with the Minimum Federal Safety Standards in §49 CFR Parts 191 and 192.

In response to this NOA, I have set out each of the identified inadequacies below along with a written response.

1. OPM, Div. II, Section 5.1.1 defined incidents but did not include Underground Natural Gas Storage Facilities (UNGFS) in the definition. (§ 191.3)
 - a. Section 5.1.1 has been revised to include UNGFSs in its definitions of an incident.
2. OPM, Div. II, Section 5.8.1 contained procedures for filing annual reports that did not include UNGSF or identified the correct form. (§ 191.17)
 - a. Section 5.8.1 has been revised to require the filing of annual reports for UNGFSs to PHMSA on DOT Form PHMSA 7100.4-1.
3. OPM, Div. I, Section 1.3 contained procedures for obtaining an Operator Identification Number (OPID) and for notification of changes but failed to include specific language for UNGFSs in those procedures. (§ 191.22)
 - a. Section 1.3 is no longer the correct reference for these procedures. These procedures have been revised to include specific language regarding UNGFSs in its procedures for obtaining an OPID and notification of changes and are now found in Division II, Section 5.12.

4. OPM Div. II, Section 5.6 did not address safety related conditions for UNGSFs as required by § 191.23.

- a. Section 5.6 has been revised to address safety related conditions for UNGSFs.

Each of these revised procedures are attached for PHMSA's review. Please let me know if you have any questions or more detail is needed.

Sincerely,



James M. Hotinger, PE
Director, Regulatory Compliance

