DIVERSIFIED GAS & OIL
CORPORATION

PUBLIC VERSION

May 4, 2021

Via Electronic Mail and Overnight Delivery Service

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

RE: Notice of Amendment, CPF 1-2021-021-NOA and Warning Letter, CPF 1-2021-022-WL Response of Diversified Midstream LLC and Cranberry Pipeline Corp (WV)

Dear Mr. Burrough:

Pursuant to (1) the Notice of Amendment issued March 11, 2021 in CPF 1-2021-021-NOA (the "NOA") and the April 9, 2020 notice granting an extension to respond to the NOA and (2) March 11, 2021 Warning Letter issued in CPF 1-2021-022 WL ("Warning Letter"), Diversified Midstream LLC ("Diversified Midstream"), OPID 39619, and its subsidiary Cranberry Pipeline Corp (WV) ("Cranberry Pipeline"), OPID 2859 (collectively the "Company") hereby respectfully provide the following response (the "Response") to the issues and inadequacies identified in the NOA and WL.

As set forth below in Exhibit A and Exhibit B, and in the confidential Attachments referenced herein, the Company provides amended supporting polices and/ procedures, as applicable, addressing each of the Pipeline and Hazardous Materials Safety Administration ("PHMSA") requests in the NOA and issues of probable violations in the WL. For ease of review, PHMSA's requests are organized by code sections, paraphrased, and are reiterated in bold herein.

As you are likely aware, at the time of PHMSA's inspection (May 19- 20, 2020), Diversified Gas and Oil Corporation ("DGOC") was engaged in the acquisition of the Heizer and Raleigh (Maxton) underground natural gas storage fields and their related assets from Carbon Energy Corporation and Nytis Exploration Inc.. Immediately after DGOC acquired these assets (May 27, 2020), the Company undertook several transitional activities, including the review of existing programmatic components. Upon the conclusion of that review, the Company developed and implemented a revised comprehensive operations and maintenance manual, and supporting policies and procedures, which are presented for PHMSA's review and consideration in this Response.

The Company believes that certain of the materials provided in this Response qualify for confidential treatment under 5 U.S.C. 552(b) ("Confidential Materials"). More specifically, the Company believes that the Confidential Materials are privileged and confidential pursuant to 5 U.S.C. 552(b)(4) because they include detailed proprietary and commercially sensitive information about the operation and related costs of the Company's pipeline and storage facilities, the disclosure of which would unfairly prejudice the Company. Accordingly, pursuant 49 C.F.R. § 190.208(e), the Company is providing the following:

- A Public Version of the Response, which includes a narrative response to the issues identified by PHMSA in the NOA (as set forth in Exhibit A) and the WL (as set forth in Exhibit B), but omits the referenced Attachments because they contain Confidential Materials; and

- A Confidential Version of the Response, which includes both the narrative response to the issues identified by PHMSA in the NOA (as set forth in Exhibit A) and the WL (as set forth in Exhibit B), as well as the specific Attachments referenced in the narrative response. Given the size of the Attachments, the entire Confidential Version is being provided on a UBS disk drive via overnight mail.

The Company also respectfully requests that PHMSA address any additional questions or comments regarding this Response, or any future inquiries regarding Diversified Midstream or Cranberry to the following representatives:

Mr. Maverick Bentley Senior Vice President Diversified Midstream LLC 100 Diversified Way Pikeville, Kentucky 41501 mbentley@dgoc.com 330-896-8510, Ext 320	Mr. Benjamin Sullivan Executive Vice President, General Counsel and Corporate Secretary Diversified Gas and Oil Corporation 414 Summers Street Charleston, West Virginia 25301 bsullivan@dgoc.com 304-353-5012

The Company respectfully requests that PHMSA consider the additional information provided, our ongoing cooperation, operating history and transitional program status when reviewing our Response. The Company's decisions to transition to a unified Operations and Maintenance Manual and to develop and implement a UNGSF Integrity Management Program, represent significant program improvements and demonstrate the Company's ongoing commitment to regulatory compliance and pipeline safety. We are confident that, based upon the information provided in this Response, PHMSA will be able to conclude that the compliance and safety issues identified in the NOA and WL have been fully addressed by the Company, and that the Response otherwise meets the requirements of 49 CFR 192.12(c) & (d).

Please let me know if you have any questions about the Company's Response or if you would like additional information. The Company looks forward to working cooperatively with PHMSA to resolve completely the inadequacies identified in the NOA and the probable violations identified in the WL in a manner that complies with all applicable rules, regulations and policies so that these actions may be closed as soon as possible.

Sincerely,

Maverick Bentley
Senior Vice President