



Southern Star Central Gas Pipeline, Inc.

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Phone 270/852-5000

May 26, 2021

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
Eastern Region Office
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Mr. Robert Burrough,

RE: Response to Notice of Amendment (CPF 1-2021-038-NOA)

On May 20, 2021 you issued a letter to Southern Star Central Gas Pipeline, Inc (Southern Star) outlining a Notice of Amendment (NOA) based upon an inspection, which was performed pursuant to Chapter 601 of 49 United States Code. In the Notice of Amendment, PHMSA alleged that Southern Star's written procedures for conducting operations, maintenance, and emergency preparedness and response activities under 192.12(b) were inadequate. PHMSA noted that at the time of the investigation, Southern Star procedures did not state the precautions that should be taken when using equipment that has not been approved for usage during workover operations – specifically that Southern Star procedures did not have provisions preventing the use of equipment that could cause an uncontrolled release of gas.

Following the incident, Southern Star revised its Operations and Maintenance Gas Storage Procedure 85.02.03 - Setting and Retrieving a Bridge Plug. The three main edits to this procedure are listed below:

- Section 4.1.10.1 – Secure lubricator (and blow out preventer if required) to prevent rotation
- Section 4 Note – Only use straight pipe and fittings if a blow off extension is utilized
- Section 5 Note – Stand out of line of fire while blowing down equipment.

These procedure revisions were submitted to PHMSA and reviewed prior to being granted clearance to complete the planned work.

Please see attached document for a copy of Southern Star's Gas Storage Procedure – 85.02.03 – Setting and Retrieving a Bridge Plug Procedure.

Southern Star is committed to operating a safe and reliable storage system and will continue to take measures daily to protect those individuals who live and work along our system.

Sincerely,

/s/ 

V.P. & Chief Operations Officer