



WBI ENERGY TRANSMISSION, INC.
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Response to Notice of Amendment CPF 1-2021-054-NOA

November 1, 2021

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

Dear Mr. Burrough,

Concerning PHMSA's October 7, 2021 Notice of Amendment (CPF 1-2021-054-NOA), PHMSA required that two inadequacies discovered within WBI's written procedures be revised.

The first inadequacy listed in Notice of Amendment CPF 1-2021-054-NOA was failure to include within WBI's written procedures a requirement to submit a supplementary report after an incident report is filed, pursuant to §191.15(d). A revision to WBI's Emergency Operating Procedure was implemented, requiring that a supplemental report be submitted using DOT Form F7100.2 if additional related information is obtained after an incident report is submitted. This revision can be found on page 11 of WBI's Emergency Operating Procedures & Dispatching Instructions. The revision can be seen in the highlighted text below. WBI believes that this revision to our Emergency Operating procedure corrects the inadequacy stated by PHMSA and is compliant with §191.15(d).

responsibility for transmittal to all state and federal authorities. The WBI Energy operator ID number is 22655 and is used for verification of electronically submitted reports. If additional related information is obtained after the incident report is submitted, a supplemental report will be submitted. A supplemental report will be submitted using DOT Form F7100.2 and will be submitted as soon as practicable, with a clear reference by date to the original incident report.

When an event occurs that could possibly meet any of the conditions outlined above,

The second inadequacy listed in Notice of Amendment CPF 1-2021-054-NOA was failure to list that well records must be kept for the life of the facility, pursuant to API RP 1171 Section 6.11.1. WBI's *Underground Natural Gas Storage Integrity Management Plan and Procedures* was updated in Section 1.90 (page 7) to require that well records be kept for the life of the storage facility, rather than life of the well, as shown in the highlighted text below. WBI believes that this revision to our Underground Natural Gas Storage Integrity Management Plan and Procedures corrects the inadequacy stated by PHMSA and is compliant with API RP 1171 Section 6.11.1.

Documentation of any deviation from API RP 1171 approved during the IFR will be retained as long as the deviation is in effect. If the deviation applies to a specific well or wells, and pertains to a physical attribute of the well, documentation of the deviation must be included in the well file and retained for the life of the storage facility. The System Planning Department is responsible for the retention of documentation of the deviation.

WBI believes that these revisions to the Emergency Operating Procedures and Underground Natural Gas Storage Integrity Management Plan and Procedures fulfills the requirements of CPF 1-2021-054-NOA. If additional information or clarification is needed, please contact Kent Kahl via email kent.kahl@wbenergy.com or phone (406) 359-7222.

Sincerely,



Jeffrey Rust
Vice President of Operations
WBI Energy Transmission