

August 31, 2021

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

REFERENCE: CPF 1-2021-055-NOA

Dear Mr. Burrough,

The following information is provided in response to the Notice of Amendment (NOA), CPF-1-2021-055-NOA, dated August 12, 2021, and the three (3) inadequacies relative to the written procedures for Central Valley Gas Storage (CVGS) noted in the NOA. These inadequacies are related to an inspection of CVGS's plans and procedures on July 7-10, 2020 with the Minimum Federal Safety Standards in Title 49 C.F.R. 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. CVGS's written procedures for operations, maintenance, and emergency preparedness and response activities were inadequate because they failed to address reporting requirements for Underground Natural Gas Storage Facilities (UNGSF). (192.12(b))
 - a. CVGS's Procedures 1.01 (Reporting and Control of Incidents Procedure) and 1.02 (Reporting of Safety Related Conditions Procedure) have been revised to include UNGSFs in its definitions of an incident, immediate reporting of certain incidents, 30-day incident reports and supplemental or revised incident reports. In addition, Procedure 1.02 was revised to address safety related conditions at UNGSFs.
2. CVGS's Integrity and Risk Management Plan (RMP), dated March 2019, failed to state what the referenced programs were or how they incorporated the required safeguards, nor did it provide any information regarding the location of the programs within either the RMP or elsewhere. CVGS must revise its manuals to adequately address the requirements set forth in API RP 1171 Section 11.9.1. (192.12(b))
 - a. CVGS's Procedures have been revised to incorporate safeguards for the environment, site security, safety and health. See "Setting up for the Task/Safety" sections of all field procedures (ex: SO-001 Wellsite Inspection Procedure) and SO-101 Wellsite Security and Safety Procedure.

3. CVGS's written procedures required by § 192.12(d)(4) were inadequate. CVGS must revise its RMP procedure to address threat and hazard interactions in accordance with API RP 1171 Section 8.3.2. (192.12(d)(4))
 - a. Section 1.1.2 of the CVGS RMP has been revised to include the assessment of threat and hazard interactions in accordance with API RP 1171, Section 8.3.2.

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

Cc: Stephen L. Wassell
Robert Cornell
Dennis Chappell

