



By Electronic Mail

February 24, 2022

Rob Burrough, Director
Eastern Region
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: Trunkline Gas Company
Notice of Amendment
CPF 1-2022-007-NOA

Dear Mr. Burrough:

Trunkline Gas Company (TGC or Company) is submitting the attached procedure in response to a Notice of Amendment (NOA) issued on January 21, 2022, by the Pipeline and Hazardous Materials Safety Administration (PHMSA). The PHMSA NOA identified one (1) alleged inadequacy within the Company's procedures for its underground storage facilities. TGC is a wholly owned subsidiary of Energy Transfer Company (ETC).

By way of background, this NOA was issued following an inspection of the Epps Storage Field in West Carroll Parish, Louisiana conducted from June 15, 2021 through June 17, 2021 and on June 24, 2021.

NOA Item 1

PHMSA identified the alleged inadequacy within the Company procedure described below:

1. **§ 192.12 Underground natural gas storage facilities.**
 - (a) ...
 - (b) **Procedural manuals. Each operator of a UNGSF must prepare and follow for each facility one or more manuals of written procedures for conducting operations, maintenance, and emergency preparedness and response activities under paragraphs (a) and (b) of this section. Each operator must keep records necessary to administer such procedures and review and update these manuals at intervals not exceeding 15 months, but at least once each calendar year. Each operator must keep the appropriate parts of these manuals accessible at locations where UNGSF work is being performed. Each operator must have written procedures in place before commencing operations.**

TGC's written procedures for conducting operations and maintenance activities were inadequate to ensure safe operation of a pipeline facility. Specifically, TGC's written procedures did not specify that its operations & maintenance manuals would be reviewed and updated at intervals not to exceed 15 months.

During the inspection, PHMSA reviewed TGC's UNGS O&M Reservoir Plan. Although TGC's procedures require an annual review of the O&M manuals, the procedures did not specify that the review interval would not exceed 15 months, but at least once each calendar year, in accordance with 192.12(c).

Therefore, TGC's written procedures required by § 192.12(c) were inadequate. TGC must revise its procedures to address the review frequency of its O&M manuals.

NOA Item 1 Response

The U.13 Underground Storage "Annual Review" procedure, Section 4.0 has been updated to require review of the UNGS Compliance Program once per calendar year, not to exceed 15 months. Per Section 7.2 of procedure U.13, the Compliance Program includes the Integrity Management Plan, the Annular Pressure Management Plan and the Operations and Maintenance Plan. The Operations and Maintenance Plan includes, among other plans/procedures, the UNGS Reservoir Plan.

TGC believes the updated U.13 "Annual Review" procedure fully addresses the findings of the NOA. A copy of this procedure is included as Attachment A for PHMSA's review.

TGC shares PHMSA's commitment to pipeline safety, public safety, and pipeline integrity. Should you have any questions or concerns please contact me at (713) 989-7126 or via email at todd.nardozzi@energytransfer.com.

Sincerely,

**Todd
Nardozzi**

Todd Nardozzi

Director – Regulatory Compliance

Digitally signed by
Todd Nardozzi
Date: 2022.02.24
09:19:48 -06'00'

cc: Eric Amundsen, SVP - Operations
Mark Milliken, VP - Technical Services
Karen Benson, Sr. Director – Underground Storage