



ELIZABETHTOWN
KENTUCKY

Elizabethtown Natural Gas
200 West Dixie Avenue
P.O. Box 550
Elizabethtown, KY 42701

March 10, 2022

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

Re: Response to Notice of Amendment CPF 1-2022-024-NOA

Dear Mr. Burrough:

In response to the Notice of Amendment provided to Elizabethtown Natural Gas (ENG) dated February 24th, 2022, we recognize the potential inadequacy in our underground storage documentation as noted and appreciate the opportunity to address this concern by amending our plans and procedures in a timely fashion. We are committed to the safe, efficient, and compliant operation of our underground storage assets and welcome this feedback as we seek to continuously improve our operations against industry best practices and meet or exceed all appropriate PHMSA regulatory requirements.

Specific to the notice provided, the following concerns were provided:

“1. § 192.12 Underground natural gas storage facilities.

(a) ...

(c) *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 or beginning an activity not yet implemented.

ENG's written procedures for conducting operations, maintenance, and emergency preparedness and response activities under § 192.12(b) were inadequate. Specifically, ENG's *Storage Operations and Maintenance Manual*, dated 4/1/2021 (O&M Manual), lacked details for the operation of underground natural gas storage fields with regard to reporting safety related conditions (SRCs) in accordance with the requirements of § 191.23 and § 191.25.

During the inspection, PHMSA reviewed the O&M Manual and determined that ENG did not have a procedure to report SRCs.

Therefore, ENG's written procedures required by § 192.12(c) were inadequate. ENG must revise its procedures to address SRC reporting requirements.”

In recognition of the need for this amendment to our existing documentation, we have added language to specifically reference the appropriate SRC reporting requirements and underlying regulatory framework guiding the identification of such conditions to our Storage O&M Manual Section 21.0 – Regulatory Reporting and Notifications. This additional language addresses both the conditions which would require a report as well as the required content and delivery methodology of said reports, with language tailored to specific application at ENG’s Cecilia Storage Field and adjacent operations.

A revised version of the ENG Storage O&M Manual is included with this response for your review, with this version currently in effect for the operations of ENG’s storage assets and associated facilities.

We hope that this fully and promptly addressed the concerns outlined in this notice. If you require any additional information, clarifications, or have any comments or questions, please contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Hobbs", with a long horizontal flourish extending to the right.

Matthew Hobbs
Gas System Engineer

Enclosure: Storage O&M Manual