



WBI ENERGY TRANSMISSION, INC.
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Response to Notice of Amendment CPF 1-2023-006-NOA

February 8, 2023

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 February 2, 2023 Notice of Amendment (CPF 1-2023-006-NOA), PHMSA required that one inadequacy discovered within WBI's written procedures be revised.

The inadequacy listed in Notice of Amendment CPF 1-2023-006-NOA was failure to include within WBI's written procedures a process to assess threat and hazard interactions in accordance with API RP 1171, Section 8.3.2. The inspector found that WBI was addressing threat and hazard interactions but did not procedurally address the actions performed. A revision to WBI's Underground Natural Gas Storage (UNGS) Integrity Management Plan and Procedures, Section 1.30 and Section 2.30, was implemented to address threat and hazard interactions. The revision to Section 1.30 and Section 2.30 can be found on page 4 and page 14 respectively in the UNGS Integrity Management Plan and Procedures and are also highlighted below.

1.30 UNDERGROUND STORAGE RISK MANAGEMENT

To properly assess and address the risk to its UGS facilities, WBI Energy will develop and implement a comprehensive risk management plan specifically for its UGS facilities. The risk management plan, following the guidance of API RP 1171, will identify and address potential risks to WBI Energy's UGS facilities, assess those risks, and identify measures to prevent and/or mitigate those risks. The risk management plan will directly address the risks to WBI Energy's natural gas storage wells and reservoirs, and include threats and hazards both subsurface and on the surface above the storage reservoir. The plan will also address threat and hazard interaction of said facilities by utilizing a threat-hazard multiplier in the MRAT table.

2.30 THREAT AND HAZARD IDENTIFICATION

As defined in API Recommended Practice 1171, Section 8.4.1, a hazard is defined as “...a situation or condition that has the potential to cause loss, damage, or harm...” and a threat “... can be created by an encounter with or an activation of a hazard...”. WBI Energy will use API Recommended Practice 1171 Table 1 as the guide for its threat and hazard identification.

The multidisciplinary team will review the threats presented in API Recommended Practice 1171 Table 1 to determine if the threat is applicable to WBI Energy’s storage facilities, and if so, if the threat should be clarified to better describe the threat. The threats and hazards identified will be documented in Master Risk Analysis Table (MRAT) maintained by the Compliance and Pipeline Integrity Department and used in the risk analysis. The MRAT will be stored on WBI Energy’s Intranet.

Because site specific risk analyses are being performed, certain threats or hazards in API RP 1171 Table 1 may not be applicable to any or all facilities; these threats and hazards may be excluded. The exclusion of any threat or hazard must be justified and documented; an excluded threat or hazard will be reevaluated during subsequent reviews of threats and hazards. The exclusion of a threat or hazard will be documented in the MRAT or in the risk analysis table for the specific facility.

A lack of data or information shall not be justification for the exclusion of a specific threat or hazard; if sufficient information for a specific threat or hazard is not available to determine the ranking of the threat or hazard, a default ranking shall be applied.

To ensure consistency during the risk analysis process, the multidisciplinary team shall also develop a ranking system for the likelihood of each threat and hazard. The ranking guidelines shall be included in the MRAT.

The multidisciplinary team shall periodically review the threats and hazards to determine if the threats and hazards identified are still applicable. Any threat or hazard previously excluded will be reexamined to determine if the exclusion still applies or if the threat or hazard should be included in risk analysis. The multidisciplinary team will also review any incidents or safety related conditions involving WBI Energy’s UGS facilities to identify additional potential threats. Regulatory changes shall also be considered during the threat and hazard review. The review and any revisions shall be documented on the MRAT.

Following the process used to identify threats and hazards, the multidisciplinary team will also identify and develop a ranking system for potential consequences based on the threat and hazard interactions. The potential consequences will be included in the MRAT. Table 1 from API RP 1171 shall be used to identify potential consequences; the exclusion of any potential consequences listed in API RP 1171 Table 1 will be documented in the MRAT.

WBI believes that this revision to the UNGS Integrity Management Plan and Procedures fulfills the requirements of CPF 1-2023-006-NOA. If additional information or clarification is needed, please contact Kent Kahl via email kent.kahl@wbienergy.com or phone (406) 359-7222.

Sincerely,

A handwritten signature in blue ink, appearing to read "Trevor Hastings", with a stylized flourish at the end.

Trevor Hastings
President and Chief Executive Officer
WBI Energy Transmission