



FEDEX Delivery

April 6, 2023

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

Reference: CFP 1-2023-024-NOA
Notice of Amendment Response

Dear Mr. Burrough:

Eastern Shore Natural Gas Company (ESNG) is in receipt of the March 16, 2023 Notice of Amendment regarding an inspection of ESNG's procedures for Control Room Management in Dover, DE, conducted from September 26 to September 29, 2022, and performed by representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA).

As a result of the inspection, PHMSA has issued a Notice of Amendment in which it was stated that "Eastern Shore's written control room management procedures were inadequate pursuant to § 192.631(e)(5)" and that "Eastern Shore must revise its procedures to address this deficiency."

ESNG Response:

As a follow-up to the inspection, ESNG revised the written procedures for conducting workload analysis in a manner that reflects the need for additional detail as it relates to the specific activities by which ESNG will "monitor the volume of general activity being directed and required of each controller." The updated procedure has been included with this response. Please note we have identified the document as "CONFIDENTIAL".

In addition, ESNG conducted evaluations and assessed the qualifications of third-party vendors to support this effort through the provision of work-load analysis and reporting on an annual basis. A vendor has been selected and the workload assessment is scheduled to begin during the second quarter of 2023. The assessment should be complete during the third quarter of 2023. ESNG will continue to review and update its procedures where applicable and enhance the associated documentation requirements as a result of the study.

Should you have any further questions, please feel free to contact me directly.



Sincerely,

Richard Welsh

Richard Welsh
Manager, Operations Compliance

Enclosure: ESNG Operator Fatigue – Confidential
 ESNG Operator Fatigue - redacted