

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

June 15, 2023

Mr. Leonard P. Singh
President
Ameren Illinois Company
10 Executive Drive
Collinsville, Illinois 62234

CPF 1-2023-040-NOA

Dear Mr. Singh:

From March 21 to 24, 2022, in an on-site inspection, the Illinois Department of Natural Resources, Office of Oil and Gas Resource Management (IDNR), acting as a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Ameren Illinois Company's (AIC) Glasford Storage in Peoria County, Illinois.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within AIC's plans or procedures. The items inspected and the inadequacies are described below:

1. **49 C.F.R. § 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.**

AIC's written procedures for conducting operations and maintenance activities were inadequate to ensure safe operation of a pipeline facility. Specifically, AIC's procedure failed to provide sufficient detail to address situations where the testing of the master valve and pipeline isolation valve indicated that the valves failed to isolate the wellhead in accordance with API RP 1171, Section 9.3.2 (Section 9.3.2). See § 192.12(b), as incorporated by reference at § 192.7(b)(11).

Section 9.3.2 states, in part, that "[t]he operator shall test the operation of the master valve and wellhead pipeline isolation valve at least annually for proper function and ability to isolate the well. The valves shall be maintained, repaired, or replaced in accordance with the operator's valve maintenance program for isolation valves."

During the inspection, the Illinois DNR reviewed AIC's procedures for wellhead valve testing, and noted the procedure did not provide detailed actions to take when a valve fails the isolation test. AIC's procedure also did not provide detailed actions to repair or replace valves that were found to be defective through annual testing.

Therefore, AIC's procedure for wellhead valve testing was inadequate, as it did not include procedures regarding the repair or replacement of valves that were not properly functioning in accordance with Section 9.3.2. AIC must revise its procedures to address the inadequacies noted above.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Compliance Proceedings.

Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that AIC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2023-040-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings