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August 30, 2023

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

REFERENCE: CPF 1-2023-052-WL

Dear Director Burrough,

The following information is provided in response to the Warning Letter (WL), CPF-1-2023-052-WL, dated August 10, 2023, issued for Northern Illinois Gas Company's (Nicor) Lake Bloomington storage facility (Facility). The WL arises from an inspection conducted at the Facility from July 25-27, 2022 for compliance with the Minimum Federal Safety Standards in §49 C.F.R. Part 192, led by the Illinois Department of Natural Resources (IDNR). While Nicor is not required to respond to the WL, the Company respectfully seeks to make the Pipeline and Hazardous Materials Safety Administration (PHMSA) and IDNR aware of certain additional information, as well as changes that the Company has put in place, to address their findings.

Two alleged probable violations were identified by the IDNR representatives, and subsequently detailed in the PHMSA-issued WL, relative to recordkeeping and the availability of O&M manuals. Nicor sets out each of the alleged probable violations below, along with a written reply.

Probable Violation 1: Pursuant to 49 CFR Section 192.12(b)(1), the WL alleges that Nicor failed to meet the provisions of this Section by not having records demonstrating that surface and groundwater safeguards were used during well work operations.

Nicor Response: During this inspection, Nicor representatives provided evidence of purchasing the Visqueen barriers utilized in our workover operations, as noted in the WL. However, Nicor did not have documentation of its use. Subsequent to this inspection, Nicor modified its Standard Operating Procedures (SOP) to add a specific section for environmental safeguards that uses a daily checklist documenting activities performed each day. This document and checklist are utilized each morning of an active workover to facilitate the safety discussion.

Subsequent IDNR inspections related to environmental safeguards at Nicor facilities located at Lexington, Pecatonica, and Troy Grove were deemed compliant based upon the use of the modified SOP.

Probable Violation 2: Pursuant to 49 CFR Section 192.12 (c), the WL alleges that Nicor failed to meet the provisions of this Section by not keeping the current version of the Emergency Preparedness and Response Plan (EPRP) or the current operation and maintenance procedures readily accessible to storage personnel at the time of the inspection.

Nicor Response: As noted in the WL, the physical hard copy of the station EPRP was off location due to its scheduled revision. Subsequent to the inspection, Nicor revised its processes to make any hard copy revisions on site to ensure a hard copy of the EPRP was available at all times.

In addition, Nicor would like to note that a digital copy of the EPRP was accessible to station personnel via Nicor's computerized SharePoint site. Also, each supervisor maintains a current hard copy of the EPRP in their company vehicle.

The Company appreciates the efforts of both PHMSA and the IDNR and looks forward to future interactions with all parties. If there are any questions concerning this response, please feel free to contact me at swassell@southernco.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'S. Wassell', with a stylized flourish at the end.

Stephen L. Wassell, PE
Vice President
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Nicor Gas