

EGYPTIAN GAS STORAGE CORPORATION

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GAS STORAGE OPERATIONS
MILLS RESERVOIR – GALLATIN COUNTY ILLINOIS

March 13, 2024

U.S. Department of Transportation
Pipeline and Hazardous Material Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ. 08628
ATTN: Mr. Robert Burrough

RE: CPF1-2024-002-NOA

Mr. Burrough,

Below, please find Egyptian Gas Storage Corporation's response to your NOA letter dated January 18, 2024. Each of the items mentioned within your NOA letter were amended following the 2022 audit, re-audited in 2023, and each were deemed to be satisfactory by the PHMSA inspectors of the Illinois Department of Natural Resources – Division of Oil and Gas. Should you, or your staff, require any additional detail or amendments to these portions of our regulatory plans, please do not hesitate to let us know and we will be happy to work with your department to ensure full regulatory compliance.

1. 49. C.F.R. § 192.12 Underground Natural Gas Storage Facilities:

As Egyptian Gas Storage Corporation operates not only a natural gas storage field consisting of 10 injection/withdrawal wells and 1 monitor well, but also operates a natural gas transmission line, and the transmission system is part of Consumers Gas Company's distribution system, there are several manuals pertaining to each of these aspects of our system and the various emergency situations and response procedures. With respect to our underground natural gas Storage Facility and the wellbores themselves, our procedures for accidental releases, equipment failures, and third-party emergencies is contained within Egyptian's Risk Management Plan Section 3 – Site Security and Safety, Site Inspections, and Emergency Preparedness and Response. This section contains specific information pertaining to the wells and field itself, including hydrocarbon releases, blowout contingency plan and response checklists. Section 2 – Integrity Demonstration, Verification, and Monitoring Practices addresses a variety of wellbore and reservoir integrity issues including third-party activity which could lead to an emergency condition. This Risk Management Plan was subjected to audit by PHMSA inspectors in December of 2023 and was found to be compliant with API RP 1171. A copy of the entire Risk Management Plan Manual is enclosed herewith for your review.

2. 49. C.F.R. § 192.12 Underground Natural Gas Storage Facilities:

As mentioned in the above response, Section 3 of Egyptian's Risk Management Plan contains a written blowout contingency plan. A copy of the entire Risk Management Plan Manual is included for your review. The Blowout Contingency Plan can be located on pages 30-37 of this manual.

3. 49. C.F.R. § 192.12 Underground Natural Gas Storage Facilities:

Within Egyptian's Risk Management Plan under Section 1, Part F – Preventative and Mitigative Measures, includes specific instruction and procedures for the testing of the "master valve" each physically tagged and labeled in the field as "Valve #1" and pipeline isolation valve "Valve 2" which are to be tested on a bi-annual basis in conjunction with bi-annual well inspections. This information can be specifically located within this plan on Page 11.

4. 49. C.F.R. § 192.12 Underground Natural Gas Storage Facilities:

Within Egyptians Risk Management Plan under Section 1 – Risk Management for Gas Storage Operations, Egyptian has provisions for evaluating and managing risk. Please find Section 1 of the Risk Management Plan on Page 4 of the enclosed Manual.

5. 49. C.F.R. § 192.12 Underground Natural Gas Storage Facilities:

Within Egyptian's Risk Management Plan under Section 2 Integrity Demonstration, Verification, and Monitoring Practices, more specifically Paragraph D "Reservoir Integrity" provides for the continual surveillance of the buffer zone for third-party activities which may impact the storage reservoir. Additionally, provisions for mechanical integrity testing are contained within Section 2 of this manual as well.

This entire plan was audited on December 11th through December 15th and was found to be fully compliant with the regulations. The post-inspection preliminary findings found one identified issue, noting that on our last workover, which occurred prior to the 2022 audit, that we had not conducted a documented pre-work safety meeting. Egyptian Gas Storage has committed that prior to all well workover or remedial operations, we will have a documented safety meeting with our entire personal group.

Egyptian gas storage is committed to achieving total regulatory compliance, or as much as is practicable, relating to our natural gas storage wells and reservoir as we have for the past 40+ years with respect to our natural gas transmission system. Should you, your department, or the local inspectors find any part of our compliance manual to be unsatisfactory, or in need of additional amendment, please let us know and we will work diligently to remedy such issues.

Respectfully Submitted,



Charles H. Robinson – President
EGYPTIAN GAS STORAGE CORPORATION