



VIA EMAIL (robert.burrough@dot.gov)
AND REGULAR MAIL

April 10, 2024

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

Re: Leaf River Energy Center LLC -- CPF 1-2024-013-WL
Response to Warning Letter

Dear Mr. Burrough

Leaf River Energy Center LLC ("Leaf River") is in receipt of the Warning Letter, dated February 15, 2024, and hereby submits its response. Leaf River hereby confirms that it has addressed and corrected the items identified in the letter.

More specifically, Leaf River provides the below information on the correction of the 7 probable violations identified in the letter, sequenced in the order that they appear in the letter, as follows:

1. Failure to Provide Electronic Notification to PHMSA of Certain Maintenance Activities

Status - Fully Resolved – Leaf River has provided the required electronic notification to PHMSA of the maintenance done on well CW #2 in 2022. Leaf River has reviewed and improved its processes to better ensure that timely notification is provided in the future.

2. Failure to Include and Adequately Evaluate Potential Threats and Hazards Impacting the Cavern Storage Field in its Risk Management Model

Status – Fully Resolved – Leaf River has incorporated into its risk management model potential threats and hazards impacting monitor well MW-01. Also, Leaf River has incorporated likelihood scoring and descriptors for all threats within the risk model and evaluated threats to the caverns from third party producing wells within the risk management model.

3. Failure of Integrity Management Program to Timely Meet the Provisions of Section 8 of API RP 1171 and § 192.12(d)

Status - Fully Resolved – Leaf River's *Underground Storage Integrity Management Program Plan*, effective on January 1, 2023, meets the provisions of Section 8 of API RP 1171 and § 192.12(d). Leaf River has reviewed and improved its processes to better ensure timely adoption and compliance with new regulations in the future.

4. Failure to Review its Blowout Contingency Plan Titled Well Control Emergency Response Plan at Intervals Not Exceeding 15 Months, But At Least Once Each Calendar Year

Status - Fully Resolved – Leaf River has evaluated and improved its manual review schedule to better ensure that all manuals of written procedures are reviewed at intervals not exceeding 15 months, but at least once each calendar year.

5. Failure to Perform an Annual Effectiveness Review of Its Integrity Monitoring Program

Status - Fully Resolved – Leaf River has evaluated and improved its review schedule to better ensure that an effectiveness review of its Integrity Monitoring Program is conducted each calendar year as specified in its written procedures.

6. Failure to Perform an Annual Review of Its 2022 Risk Assessments

Status - Fully Resolved – Leaf River has evaluated and improved its review schedule to better ensure that a review of its risk assessments for the Leaf River Energy Center salt cavern storage field along with the four wells within it is conducted annually. Also, Leaf River has updated the scoring of certain well threats from maintenance work done on well CW-01 in 2021 and well CW-02 in 2022.

7. Failure to Perform Risk Monitoring and Risk Management Effectiveness Reviews as Specified in its Risk Management Procedure

Status - Fully Resolved – Leaf River has evaluated and improved its review schedule to better ensure timely review of its storage management plan's effectiveness at achieving risk management goals and objectives.



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If you have any questions or would like to discuss the contents of this response further, please do not hesitate to contact me or Aaron Bass, Director Safety, Engineering, Integrity & Compliance at abass@njresources.com or (302) 598-6061.

Regards,

LEAF RIVER Energy Center LLC



James Eckert
President

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