



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

April 16, 2024

Ms. Tina Faraca
Executive Vice President and President
U.S. Natural Gas Pipelines
Columbia Gas Transmission, LLC, a subsidiary of TC Energy Corporation
700 Louisiana Street, Suite 700
Houston, Texas 77002

CPF 1-2024-029-NOA

Dear Ms. Faraca:

From September 19, 2023 to September 21, 2023, and December 5, 2023 to December 6, 2023, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Columbia Gas Transmission, LLC's (CGT) procedures for the Lucas Storage Facility in Ashland County, Ohio.

As a result of the inspection, PHMSA has identified an apparent inadequacy found within CGT's plans or procedures. The item inspected and the inadequacy is described below:

1. **§ 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.

CGT's written procedures for underground natural gas storage were inadequate to assure the safe operation of a pipeline facility. Specifically, CGT's Storage Well Site Inspection Task Package (WSITP), Section h (wellhead leak inspection) failed to contain adequate detail to satisfy the provisions of American Petroleum Institute Recommended Practice 1171 (API RP 1171) (2015), Section 9.3.2 required by the regulation.

Section 9.3.2 of API RP 1171 states, in part, "The operator shall visually inspect each wellhead assembly at least annually for leaks."

Section h (wellhead leak inspection) of CGT's WSITP stated, in part:

Using visual and/or audible signals and smells; inspect for the presence of gas leaks on the wellhead equipment.

- 0) No evidence of a leak
- 1) Minor leak
- 2) Moderate leak
- 3) Major leak

Note: Leaks can occur at various locations, including flanges, fittings, bull plugs, and ground level. Leak location and intensity should be considered. If there is a leak, it should be reported immediately.

Documentation requirement:

Complete the Sap Work Order.

Ensure equipment/entity/device information is current.

Record discrepancies in SAP

Record relevant observations, deficiencies, anomalies, and repairs for each system inspected in SAP.

Schedule any additional maintenance to be completed in a timely manner.

During the inspection, PHMSA reviewed CGT's WSITP, Section h (wellhead leak inspection) and CGT records of leaks documented in SAP in 2022. CGT's Well Inspection Task, Section h (wellhead leak inspection) was found to lack adequate detail regarding how to conduct and document the visual inspections, including details on what constituted 'no evidence of a leak', a 'minor', a 'moderate', and a 'major' leak. The procedure also lacked details about the timeframe for repairing leaks, including consideration of the severity of the leak. The procedure only directed employees to schedule additional maintenance in a timely manner.

Therefore, CGT's written procedures required by § 192.12(c) pursuant to meeting the requirements of Section 9.3.2 were inadequate to assure public safety. CGT must revise its procedures to address the discrepancy outlined 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 Enforcement

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 Columbia Gas Transmission, LLC 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 1-2024-029-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*

Cc: Daniel Cerkoney <dan_cerkoney@tcenergy.com>
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