



May 30, 2025

Mr. Robert Burrough
Director
PHMSA Pipeline Safety Eastern Region Office
US Department of Transportation
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: Notice of Probable Violation and Proposed Compliance Order CPF 1-2025-006-NOPV

Mr. Burrough,

In response to the Notice of Probable Violation and Proposed Compliance Order CPF 1-2025-006-NOPV ("the NOPV"), Richmond Gas Works (RGW) is not contesting the allegations but is providing an explanation of actions it has taken since the relevant State Corporation Commission inspection on May 10, 2023. We hope that upon considering the actions detailed in this letter, you will modify or suspend the proposed compliance order contained within the NOPV.

To remediate the two probable violations noted in the NOPV, RGW has updated its Operator Qualification Training Program ("OQ Program") with a new task titled Pipeline Expansion Joints. The task is a custom task developed within RGW's OQ training platform, Energy World Net (EWN). RGW purchased the custom training for \$10,000 from EWN. The Pipeline Expansion Joints task has updated content that covers the installation of restraining and non-restraining expansion couplings, including special fittings such as Dresser Style 63. The EWN module number is 123755, and the training interval is 12 months.

Trainings and requalifications on this task are implemented through EWN as part of the OQ Program. On March 12, 2025, managers were notified through EWN that their groups had been assigned the new Pipeline Expansion Joints task. As of the date of this letter, 100% of gas construction inspectors and gas construction inspector supervisors in the construction and maintenance sections have completed the Pipeline Expansion Joints training and are qualified for this task.

In addition to EWN trainings, RGW has scheduled a live training for contractors and staff on the installation process for the Dresser Style 63 Expansion Coupling. This training is scheduled for June 10, 2025. A representative from Dresser will attend the training to reinforce the EWN training and answer questions.

Because the updates to our OQ Program are equivalent to the requirements you are considering in the Proposed Compliance Order, we hope that you will modify or suspend the Proposed Compliance Order contained in the NOPV before issuing a Final Order.

Please let me know if you need any additional information or documentation.

Respectfully,

A handwritten signature in black ink that reads "D.W. Rifenburg". The signature is written in a cursive, flowing style.

Daniel Rifenburg
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