

VIA EMAIL (robert.burrough@dot.gov)

June 19, 2025

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

RE: CPF 1-2025-007-WL Warning Letter

Dear Mr. Burrough,

Enbridge Gas Ohio (Enbridge) received the Eastern Region's Warning Letter dated May 23, 2025, in the above-referenced case. Enbridge is committed to the safe and environmentally responsible operation of its underground natural gas storage facilities. In the Warning Letter, the region alleged the following probable violation:

PHMSA Allegation:

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.

EGO failed to follow its manual of written procedures for conducting activities under § 192.12(b). Specifically, EGO failed to follow its Storage Integrity Management Plan (SIMP), Section 33.5.6 Well Closure, during the plug and abandon of Well1707 Serbian Church #3 which was performed in April and May 2023.

EGO's SIMP, Section 33.5.6 required that EGO correct deviations which may threaten isolation objectives of the plug. It also required EGO to determine the location of groundwater and hydrocarbon bearing zones penetrated by the well, determine the condition of the well's casing and cement through those zones, and prevent communication between those zones from the plugging operation.

Prior to the plug & abandon of the well, the annulus between the 3.5-inch production casing and 5.5-inch intermediate casing had a pressure of 300 psi and gas sample analysis from 3/21/2023 confirmed it to be storage gas.

During the inspection, the Daily Well Work Report pertaining to Well 1707 was reviewed. After the installation of plug #1 and plug #2, the report noted on 4/19/2023 that the annulus had a consistent pressure of 5 psi. EGO stated no annulus gas pressure was detected once plug #3 was installed from [a] depth of 968 feet to 1311 feet. This information indicates that annulus gas pressure of 5 psi may be due to failure of plug #1 and plug #2 to achieve isolation from the storage formation. Failure of the plugs was not corrected prior to the installation of plug #3 thereby allowing the possibility of storage gas communication with formations below plug #3.

Additionally, EGO's Gas Storage-Project Checklist, Project Type: Plug and Abandonment, section 6.7.2 Storage Zone Isolation required checking the following:

Does the workplan include the condition of the well's casing and cement across those zones, (utilizing available well and log records), to prevent communication between any of those during and after plugging the well.

EGO stated a cement bond log of well 1707 was not done, thereby not utilizing log records in determining the condition of the well's cement across groundwater and hydrocarbon bearing zones.

Therefore, EGO failed to follow its SIMP, Section 33.5.6 Well Closure.

Enbridge Response:

Following the inspection, Enbridge conducted a thorough internal review of the plug and abandonment activities for Well 1707. Enbridge can confirm that the procedure for plugging and abandoning has left the well in a safe state. Enbridge appreciates the opportunity to respond to this Warning Letter and shares PHMSA's commitment to underground natural gas storage safety.

Respectfully,

Signed by:

Rusty Harris

Vice President and General Manager
Enbridge Gas North Carolina