



NGO Transmission, Inc.
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June 6, 2025

Mr. Robert Burrough
Director, Eastern District
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: Response to Notice of Amendment CPF 1-2025-010-NOA

Dear Mr. Burrough:

NGO Transmission, Inc. (NGO) hereby submits the following responses and revised procedures:

1. **During the inspection, PHMSA reviewed the EPM. The EPM failed to include a process addressing accidental releases, equipment failure, natural disasters, and third-party emergencies. Therefore, NGO's written procedures for conducting operations and maintenance activities were inadequate to provide for safe operation of a pipeline facility in accordance with § 192.12(c). NGO must revise its written procedures to address the deficiencies outlined above.**
 - a. To address this concern, an Emergency Procedure Manual (EPM) was created specifically for NGO Transmission's storage operations. The manual is drafted in sections that address each item in the Notice of Amendment Item #1 by PHMSA.
 - **Facilities** – addresses names, locations, employee roles and responsibilities, emergency contacts
 - **Emergency Classifications** – addresses all the items listed in API 1171 Section 10. This covers site security, equipment failures, well loss of control, fires, ruptures, natural disasters, third party damages and emergencies, spills and accidental releases, hazardous material inventory, threats.
 - **Investigation of Failures and Incidents / After Action Review (AAR)** – procedures for responding to an incident, collecting data, investigating, testing and analysis, incident follow-up meetings.
 - **Incident and Accident Reporting** – PHMSA and State of Ohio requirements for incidents and accidents.

A copy of the newly created NGO Transmission Storage EPM will be submitted as part of this response.

2. **During the inspection, PHMSA reviewed NGO's SIMP and found that it failed to include a process outlining the methodology and deadlines for completing baseline risk assessments for its UNGS facilities pursuant to § 192.12(d)(2). Therefore, NGO's written integrity management program failed to include a plan for development and implementation.**
- a. To address this concern Standard 3.18 of NGO Transmission's SIMP plan was amended to include the compliance deadline dates as documented in 192.12(d)(2). These edits can be found in standard 3.18 section 3.1.3.2 for reservoirs and standard 3.18 section 3.1.4.2 for storage wells. Methodology for baseline assessments for both reservoirs and wells was also included in the modifications to NGO Transmission's standard 3.18. The methodology for reservoir baseline assessments is found in standard 3.18 section 3.1.3.3. The methodology for storage well baseline assessments is found in standard 3.18 section 3.1.4.3.
 - b. Although the methodology for baseline assessments was not documented in NGO Transmission's SIMP, this methodology was utilized to establish the baseline assessments for both reservoirs and wells.
 - c. Reservoir baseline assessments were completed as noted below:
 - i. Perry Storage baseline was completed on 12-10-20
 - ii. Zane Storage baseline was completed on 3-11-21
 - iii. Muskie Storage baseline was completed on 4-6-22
 - d. The initial well inspections were 86% completed by the 40% deadline of 3-13-2024. NGO Transmission is scheduled to have 100% of the initial well baseline inspections completed by the end of 2025.

A copy of the amended NGO Transmission Storage SIMP standard 3.18 will be submitted as part of this response.

3. **During the inspection, PHMSA reviewed the SIMP and determined that it failed to identify threat and hazard interactions for their underground storage facilities and failed to outline how the interactions impact risk assessment scores/ranking, as required by Section 8.3.2. Therefore, NGO's written procedures for carrying out its integrity management program were inadequate to provide for safe operation of a pipeline facility in accordance with § 192.12(d)(4). NGO must revise its procedures to include the identification and assessment of threat and hazard interactions in accordance with Section 8.3.2.**
- a. NGO Transmission utilized RCP (a third-party vendor) to develop our initial SIMP and integrate the RCP risk model for SIMP. At the time of implementing the RCP SIMP the risk model was compliant with the requirements set forth in API 1171. The SIMP including the risk model were not subsequently updated to reflect the changes in the November 2022 edition of API 1171. Following the exit interview for the June 2024 audit NGO Transmission solicited a bid from RCP to update the risk model and SIMP to the November 2022 edition of API 1171. NGO Transmission received a scope of work and bid from RCP on 7-24-2024 but choose not to execute the bid proposal at that time because we wanted to make sure that the scope of work would satisfy the final requirements from the 2024 audit findings. To address this concern, section three of the Notice of Amendment received on May 9th, 2025, was forwarded to RCP to ensure that the proposed scope of work would satisfy the deficiencies noted by PHMSA.

- b. The following is the scope of work that RCP will complete to ensure that NGO Transmission is compliant with 192.12(d)(4)
- The second edition of API RP 1171 includes several changes made to the Wells, Reservoirs and Surface components of Table 1. The updated risk tool will incorporate new and updated sections of Section 8, Table 1.
 - The second edition of API RP 1171 includes several changes made to the preventative and mitigation action components of Table 2. The updated risk tool will incorporate new and updated sections of Section 8, Table 2. This will enhance the baseline model significantly by allowing specific risk reduction credits as these preventatives and mitigative measures are considered.
 - The underground natural gas storage industry has largely been audited by PHMSA since § 192.12 was updated and finalized in 2020. TEC, RCP and others have experience with some of the key touch points from these audits. These include PHMSA's desire for risk models to consider interactive threats. RCP proposes to work with TEC to develop meaningful threat interaction analyses relevant to TEC's storage operations.
 - RCP will develop these enhancements in .xls format, testing the model with various data sets to ensure the risk results make sense to both TEC and RCP storage subject matter experts. RCP recommends using some historical data from the current TEC risk model.
 - Once these tests are completed, the new risk model will be uploaded to TEC's TaskOp application. RCP will be sure to maintain the current risk model in the application for record retention purposes.
 - RCP will update the current written risk model standard used by TEC with the updates and enhancements made through this scope. RCP will work with TEC to train appropriate personnel on the new risk model and written standard.
- c. The timeline for completing the scope of work noted above is as follows:
- i. All aspects of the RCP scope of work are estimated to be completed before October 1st, 2025.

A copy of the scope of work from RCP will be submitted as part of this response.

If you require any additional information or have any comments, please contact me at your convenience.

Sincerely,

Don Wheeler
Operations Manager
cc: Dan McVey, Vice President/COO