

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: Scott.Hallam@bwpipelines.com

August 14, 2025

Mr. Scott Hallam
President & Chief Executive Officer
Boardwalk Pipeline Partners, LP
9 Greenway Plaza, Suite 2800
Houston, Texas 77046

CPF 1-2025-017-NOA

Dear Mr. Hallam:

From June 4 through June 6, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Boardwalk Pipeline Partners LP's (Boardwalk) procedures for its Leesville and Wilfred depleted aquifer underground natural gas storage facilities in Lawrence County and Sullivan County, Indiana.

As a result of the inspection, PHMSA has identified apparent inadequacies found within Boardwalk's plans or procedures. The items inspected, alleged inadequacies, and proposed revisions are 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.

Boardwalk's written procedures for conducting operations, maintenance, and emergency preparedness and response activities were inadequate to assure safe operation in accordance with section 192.12(c). Specifically, Boardwalk failed to include in its manual, *TL1529 Plugging and Abandoning a Well* (5/31/24), a process for the determination of groundwater and hydrocarbon bearing zones and the condition of the well's casing across those zones as required by American Petroleum Institute's Recommended Practice 1171 (API RP 1171), section 6.7.2, and section 11.2.1 which is incorporated by reference in section 192.12(b)(2).

Section 11.2.1 states that "[t]he operator shall develop and follow procedures for the construction, operation, and maintenance of natural gas storage wells and reservoirs to establish and maintain functional integrity." Section 6.7.2 includes a maintenance requirement that states "[t]he operator shall determine the location of groundwater and hydrocarbon bearing zones (in addition to the storage zone) penetrated by the well to be abandoned, and the condition of the well's casing and cement across those zones, to prevent communication between any of those zones during and after plugging of the well."

Therefore, Boardwalk's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation in accordance with section 192.12(c). PHMSA proposes that Boardwalk must revise its written procedures to address the deficiency outlined above.

2. § 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.

Boardwalk's written procedures for conducting operations, maintenance, and emergency preparedness and response activities under section 192.12(b) were inadequate to assure safe operation in accordance with section 192.12(c). Specifically, Boardwalk failed to have an isolation testing procedure in its manual, *Underground Natural Gas Storage, 1171-9.2 Well Integrity Monitoring* (5/31/24), that required personnel to confirm isolation of the well after operating the master valve and wellhead pipeline isolation valve, as required by API RP 1171, section 9.3.2, which is incorporated by reference in section 192.12(b)(2).

Section 9.3.2 in API RP 1171 states that "[t]he operator shall test the operation of the master valve and wellhead pipeline isolation valve at least annually for proper function and ability to isolate the well."

Therefore, Boardwalk's written procedures for conducting operations, maintenance, and emergency preparedness and response activities under section 192.12(b) were inadequate to assure safe operation in accordance with section 192.12(c). PHMSA proposes that Boardwalk must revise its procedures to address the deficiency discussed above.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 CFR § 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 section 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 CFR § 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 Boardwalk Pipeline Partners, LP 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 1-2025-017-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*