



September 12, 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 1-2025-017-NOA Response
Texas Gas Transmission, LLC (Texas Gas)

Dear Mr. Burrough,

On August 14, 2025, the Pipeline and Hazardous Materials Safety Administration ("PHMSA") issued the above-referenced Notice of Amendment ("NOA") in association with the inspection of Texas Gas procedures for Underground Natural Gas Storage. Record reviews were conducted from June 4 through June 6, 2024, at the Leesville and Wilfred depleted aquifer underground natural gas storage facilities in Lawrence and Sullivan Counties, Indiana. Texas Gas is a subsidiary of Boardwalk Pipelines, LP (Boardwalk).

Item 1

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

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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.

Texas Gas Response: Boardwalk created Form 1500-31: UNGS Plug and Abandonment Plan to document the plugging and abandoning of wells. References to Form 1500-31: UNGS Plug and Abandonment Plan and Task List TL1529 Plugging and Abandoning a Well (UNGS) were added to UNGS Manual 1171 6.7: Well Closure.

The following documents are enclosed:

- *Form 1500-31: UNGS Plug and Abandonment Plan*
- *UNGS Manual 1171 6.7: Well Closure*
- *MOC 2024-09-06b*
- *TL1529 Plugging and Abandoning a Well (UNGS)*

Item 2

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

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above.

Texas Gas Response: Boardwalk created a new Task List, TL1554 Function and Isolation Test. The task list is enclosed.

If you have any questions concerning the information submitted, please do not hesitate to contact me at tina.baker@bwpipelines.com or 270.688.6497.

Respectfully yours,

A handwritten signature in purple ink that reads "Tina Baker". The signature is fluid and cursive, with the first name "Tina" and last name "Baker" clearly distinguishable.

Tina Baker
Manager, Compliance Services

Attachments