



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

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609.771.7800

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: Paul.Ruppert@bhegts.com

December 2, 2025

Mr. Paul Ruppert
President, Gas Transmission & Storage
Eastern Gas Transmission and Storage, Inc.
6603 West Broad Street
Richmond, Virginia 23200

CPF 1-2025-046-NOA

Dear Mr. Ruppert:

From February 24 through April 2, 2025, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), conducted an inspection of Eastern Gas Transmission and Storage, Inc.'s (EGT&S) hazardous liquid integrity management procedures in Bridgeport, West Virginia.

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

1. **§ 195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (a) ***General.* Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

EGT&S's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, EGT&S's written procedures, *PIP-3504 – Remediation* (12/27/24) (Remediation) and *PIP-3501 - HCA Identification* (12/27/24) (HCA), failed to require that the manual be reviewed at intervals not exceeding 15 months, but at least once each calendar year in accordance with section 195.402(a).

During the inspection, PHMSA reviewed the Remediation and HCA procedures. The HCA procedure, section 5.9, and Remediation procedure, section 5.7, required reviews and updates annually or as needed. However, the HCA and Remediation procedures failed to require that the manual be reviewed at intervals not exceeding 15 months, but at least once each calendar year.

Therefore, EGT&S's written procedures for operations, maintenance, and emergencies were inadequate to ensure safe operation of a pipeline facility. PHMSA proposes that EGT&S revise its procedures to require that the manual be reviewed at intervals not exceeding 15 months, but at least once each calendar year.

2. § 195.452 Pipeline integrity management in high consequence areas.

(a) . . .

(f) *What are the elements of an integrity management program?* An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program:

(1) . . .

(3) An analysis that integrates all available information about the integrity of the entire pipeline and the consequences of a failure (see paragraph (g) of this section);

EGT&S's procedures for integrity management were inadequate to ensure safe operation of a pipeline facility. Specifically, EGT&S's written procedure, *PIP-3505 – Continual Evaluation and Assessment* (12/27/24) (Continual Evaluation), failed to include an adequate process for performing its information analysis in accordance with section 195.452(f)(3) and 195.452(g)(4).

Section 195.452(g)(4) states that an information analysis must:

Identify spatial relationships among anomalous information (*e.g.*, corrosion coincident with foreign line crossings; evidence of pipeline damage where aerial photography shows evidence of encroachment). Storing the information in a geographic information system (GIS), alone, is not sufficient. An operator must analyze for interrelationships among the data.

During the inspection, PHMSA requested EGT&S's procedures regarding the section 195.452(g)(4) requirements. The Continual Evaluation procedure, section 5.1, required EGT&S to identify spatial relationships among anomalous information and analyze for interrelationships among the data. The Continual Evaluation procedure, however, copied the regulatory text in section 195.452(g)(4) without further details regarding EGT&S's process for how and when it analyzes and integrates its pipeline data regarding spatial relationships amongst the data.

Therefore, EGT&S's procedures for integrity management were inadequate to ensure safe operation of a pipeline facility in accordance with section 195.452(f)(3). PHMSA proposes that EGT&S revise its procedures to include details regarding how and when it analyzes and integrates its pipeline data regarding spatial relationships amongst its data.

3. § 195.452 Pipeline integrity management in high consequence areas.

(a) . . .

(f) *What are the elements of an integrity management program?* An integrity management program begins with the initial framework. An operator must continually change the program to reflect operating experience, conclusions drawn from results of the integrity assessments, and other maintenance and surveillance data, and evaluation of consequences of a failure on the high consequence area. An operator must include, at minimum, each of the following elements in its written integrity management program:

(1) . . .

(8) A process for review of integrity assessment results and information analysis by a person qualified to evaluate the results and information (see paragraph (h)(2) of this section).

EGT&S's procedures for integrity management were inadequate to ensure safe operation of a pipeline facility. Specifically, EGT&S's written procedure, *PIP-3702 – Liquid IMP Job Summaries* (12/27/24) (Job Summaries), failed to include an adequate process for review of integrity assessment results and information analysis by a person qualified to evaluate the results and information in accordance with section 195.452(f)(8).

During the inspection, PHMSA requested EGT&S's procedures regarding qualifications for personnel who evaluate integrity assessments and information analysis. EGT&S provided the Job Summaries procedure which required a pipeline integrity engineer to attend at least one industry training of 18 hours or complete on the job training (OJT) with an in-line inspection (ILI) subject matter expert (SME) in order to be qualified to review ILI assessment data. The procedure also required the documenting of the OJT ILI data review and process used to conduct the review, that the ILI SME would assess and determine if the individual was competent to complete these reviews alone, and that EGT&S's technical training department would maintain records associated with this process.

However, the Job Summaries procedure failed to specify qualification requirements for the personnel who review and evaluate integrity assessment results and information analysis. When PHMSA asked for further details regarding the process used to conduct the OJT review as well as what the technical industry training was required to entail, EGT&S was unable to provide further details and stated that clarifications could be made to outline its current process being followed.

Therefore, EGT&S's procedures for integrity management were inadequate to ensure safe operation of a pipeline facility in accordance with section 195.452(f)(8). PHMSA proposes that EGT&S revise its procedures to include details which specify qualification requirements, including details on the required OJT and industry training, for the personnel who review and evaluate integrity assessment results and information analysis.

4. **§ 195.452 Pipeline integrity management in high consequence areas.**
- (a) ...
- (l) *What records must an operator keep to demonstrate compliance?*
- (1) **An operator must maintain, for the useful life of the pipeline, records that demonstrate compliance with the requirements of this subpart. At a minimum, an operator must maintain the following records for review during an inspection:**
- (i) **A written integrity management program in accordance with paragraph (b) of this section.**
- (ii) **Documents to support the decisions and analyses, including any modifications, justifications, deviations and determinations made, variances, and actions taken, to implement and evaluate each element of the integrity management program listed in paragraph (f) of this section.**
- (2) **See Appendix C of this part for examples of records an operator would be required to keep.**

EGT&S's procedures for integrity management were inadequate to ensure safe operation of a pipeline facility. Specifically, EGT&S's written procedure, *PIP-3509 Record Keeping* (12/27/24) (Record Procedure), failed to contain an adequate process for maintaining integrity management records in accordance with section 195.452(l).

During the inspection, PHMSA requested EGT&S's procedures regarding the section 195.452(l) requirements. EGT&S provided the Record Procedure. Section 5 contained a list of examples of records EGT&S may maintain and identified that the various sections of its IMP describe what documentation is required, along with the location where it can be accessed. However, section 5.2 of the Record Procedure copied the regulatory text from Part 195 Appendix C without details regarding EGT&S's recordkeeping requirements.

The Record Procedure failed to provide any details regarding which integrity management records are required to be maintained, what records from Appendix C of Part 195 are maintained, what forms or documents EGT&S records its official records on, the locations these records will be retained at, and how EGT&S can access its records. When PHMSA requested further information on which records EGT&S maintains for inspection, EGT&S stated that the procedures do not include these details.

Furthermore, each section of the integrity management procedures failed to list the location where all documents can be accessed or found. EGT&S provided various written procedures, *PIP-3507 Program Evaluation* (12/27/24) (Program Evaluation) and *PIP-3504 – Remediation* (12/27/24) (Remediation) and *PIP-3501 - HCA Identification* (12/27/24) (HCA). These procedures in section 7 included the same language as in the Record Procedure and all failed to mention the required documentation requirements.

Therefore, EGT&S's procedures for integrity management were inadequate to ensure safe operation of a pipeline facility in accordance with section 195.452(l). PHMSA proposes that EGT&S revise its procedures to provide details regarding which integrity management records are

required to be maintained, what records from Appendix C of Part 195 are maintained, what forms or documents EGT&S records its official records on, the locations these records will be retained at, and how EGT&S can access its records.

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 49 CFR § 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 Eastern Gas Transmission and Storage, Inc. maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to the Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety. In correspondence concerning this matter, please refer to **CPF 1-2025-046-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

ROBERT THOMAS
BURROUGH

Digitally signed by ROBERT
THOMAS BURROUGH
Date: 2025.12.02 11:07:18 -05'00'

Robert Burrough
Director, Eastern Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*