

December 29, 2025

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

Re: CPF-2025-046-NOA

Dear Mr. Burrough:

Please find the Eastern Gas Transmission and Storage, Inc. (EGTS) response to Notice of Amendment CPF-2025-046-NOA, dated December 2, 2025. Specifically, PHMSA identified the following apparent inadequacies within the EGTS plans or procedures:

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 the 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 no 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.

EGTS Response: Following the inspection, EGTS revised PIP-3501 (HCA identification), Section 5.9 to provide clarification that the reviews of the high consequence areas for the hazardous liquid

pipelines are conducted annually, not to exceed 15 months. EGTS notes that PIP-3501, Section 5.4.1 states that EGTS currently identifies the entire length of each of the hazardous liquid pipelines as a high consequence area which renders the reviews of the high consequence areas for the hazardous liquid pipelines superfluous. EGTS maintains that the alleged inadequacy described for PIP-3501, Section 5.9 in PHMSA's commentary for Item 1 of CPF-2025-046-NOA did not render PIP-3501 inadequate to ensure the safe operation of a pipeline facility at the time of the inspection as it necessitated a relatively minor procedural clarification.

Following the inspection, EGTS revised PIP-3504 (Remediation), Section 5.7 to provide clarification that the reviews of ENG-2004 (Liquid Pipeline Repair Manual) are conducted annually, not to exceed 15 months. EGTS notes that PIP-1003 (Maintenance of Manuals and Plans), Section 5.2.1 was also reviewed by PHMSA during the inspection and states that ENG-2004 shall be reviewed and revised as necessary each calendar year, at intervals not exceeding 15 months. EGTS notes that PHMSA requested PIP-1003 during the inspection and that PIP-1003 was submitted to PHMSA on February 28, 2025 following the conclusion of the inspection. EGTS notes that the review of PIP-1003 during the inspection and subsequent submittal of PIP-1003 on February 28, 2025 following the conclusion of the inspection was omitted from the alleged inadequacy described for PIP-3504, Section 5.7 in PHMSA's commentary for Item 1 of CPF-2025-046-NOA. EGTS maintains that the alleged inadequacy described for PIP-3504, Section 5.7 in PHMSA's commentary for Item 1 of CPF-2025-046-NOA did not render PIP-3504 inadequate to ensure the safe operation of a pipeline facility at the time of the inspection as it necessitated a relatively minor procedural clarification.

Copies of the revised PIP-3501 and PIP-3504 are included with this response.

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 a 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.

EGTS Response: Following the inspection, EGTS revised PIP-3505 (Continual Evaluation and Assessment), Section 5.1 to provide clarification that the process for the identification of spatial relationships among anomalous information occurs through execution of the existing process for conducting the risk analysis described in PIP-3503 (Risk Analysis), the existing information analysis process for integrating any encroachment or foreign line crossing data with in-line inspection assessment data, and the existing process for integrating integrity assessment data (in-line inspection assessment data integrated with any encroachment or foreign line crossing data or pressure test assessment data) with close interval survey data. Also following the inspection, EGTS formalized PIP-3706 (Liquid Lines Information Analysis) as a record of the information analysis to identify spatial relationships among anomalous information and revised PIP-3505, Section 5.1 to include reference to PIP-3706. Also following the inspection, EGTS revised PIP-3505, Section 5.1 to provide clarification that the process for the identification of spatial relationships among anomalous information occurs for a hazardous liquid pipeline after new integrity assessment data (in-line inspection assessment data or pressure test assessment data) and close interval survey data are obtained for that hazardous liquid pipeline. EGTS maintains that the alleged inadequacy described for PIP-3505, Section 5.1 in PHMSA's commentary for Item 2 of CPF-2025-046-NOA did not render PIP-3505 inadequate to ensure the safe operation of a pipeline facility at the time of the inspection as it necessitated two relatively minor procedural clarifications, the formalization of the means of recording the information analysis, and PHMSA reviewed an information analysis summary for one of the hazardous liquid pipelines that included the identification of spatial relationships among anomalous information during the inspection.

A copy of the revised PIP-3505 and a copy of PIP-3706 are included with this response.

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 a 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 qualification 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 the 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 to 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 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 review 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.

EGTS Response: EGTS contests the alleged inadequacy described for PIP-3702 (Liquid IMP Job Summaries) in PHMSA's commentary for Item 3 of CPF-2025-046-NOA, but does not request an oral hearing. PIP-3702, specifically the section regarding the essential functions of the Pipeline Integrity Engineer, was reviewed during the inspection and requires the following for a Pipeline Integrity Engineer to be considered qualified to review and evaluate integrity assessment results from in-line inspections (ILI) and information analysis:

- Attend at least one industry training, approximately 18 hours, on ILI (e.g. SGA – Practical In-line Inspection, SGA – Advanced In-line Inspection, Pipeline Pigging and Integrity Management (PPIM) – Pigging and In-Line Inspection, etc.), that cover these or similar topics: Principles of Operation of ILI Tools, Data Handling and Analysis, and Pipeline Defects and Analysis, or;

- Complete “On the Job Training” with ILI Subject Matter Expert (SME) and document the ILI data review and the process used to conduct the review of data. During this process, the ILI SME will assess the competency of the person and will determine when the person is competent to complete ILI assessments individually.

EGTS notes that PIP-3702, specifically the section regarding the essential functions of the Pipeline Integrity Engineer, requires that a Pipeline Integrity Engineer attend at least one industry training of approximately 18 hours on ILI or complete the “On the Job Training” with the ILI SME. EGTS notes that the option requiring a Pipeline Integrity Engineer to attend at least one industry training of approximately 18 hours on ILI specifies the following topics that the industry training needs to cover: Principles of Operation of ILI Tools, Data Handling and Analysis, Pipeline Defects and Analysis, or similar. EGTS notes that the option requiring a Pipeline Integrity Engineer to complete on the job training (OJT) specifies that the Pipeline Integrity Engineer conducts the in-line inspection data review under the guidance of the ILI SME and that during this process the ILI SME assesses the competency of the Pipeline Integrity Engineer in order to determine when the Pipeline Integrity Engineer is competent to conduct the in-line inspection data review individually. EGTS notes that PHMSA requested PIP-3702 during the inspection and that PIP-3702 was submitted to PHMSA on April 3, 2025 following the conclusion of the inspection which contradicts PHMSA’s commentary for Item 3 of CPF-2025-046-NOA that *“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...”*

EGTS notes that the industry training certifications and the “On the Job Training” record for the Pipeline Integrity Engineer who reviewed and evaluated the integrity assessment results from the ILI conducted on the hazardous liquid pipelines in the inspection scope were reviewed during the inspection. EGTS notes that PHMSA requested the “On the Job Training” record for that Pipeline Integrity Engineer during the inspection and that the “On the Job Training” record for that Pipeline Integrity Engineer was submitted to PHMSA on April 3, 2025 following the conclusion of the inspection. EGTS maintains that the industry training certifications and the “On the Job Training” record for the Pipeline Integrity Engineer who reviewed and evaluated the integrity assessment results from the ILI conducted on the hazardous liquid pipelines in the inspection scope meet the requirements of PIP-3702, specifically the section regarding the essential functions of the Pipeline Integrity Engineer, for a Pipeline Integrity Engineer to be considered qualified to review and evaluate integrity assessment results from ILI and information analysis.

EGTS notes that the following documents associated with Notice of Amendment CPF 1-2015-1007M were submitted to PHMSA for reference on April 3, 2025 following the conclusion of the inspection:

- Notice of Amendment CPF 1-2015-1007M (dated 4/15/2015)
- Operator Response to Notice of Amendment CPF 1-2015-1007M (dated 5/15/2015)
- Closure Letter for Notice of Amendment CPF 1-2015-1007M (dated 6/30/2015)

While CPF 1-2015-1007M pertained to compliance with §192.915(b)(2), EGTS, formerly known as Dominion Transmission, Inc. (DTI), proactively applied the changes that were made to the Integrity Management Program for the natural gas pipeline system in response to Item 1 of CPF 1-2015-

1007M to the Integrity Management Program for the hazardous liquid pipeline system for compliance with §195.452(f)(8). As noted in the Closure Letter dated 6/30/2015, PHMSA reviewed the changes that were made to the Integrity Management Program for the natural gas pipeline system for Item 1 of CPF 1-2015-1007M and responded that it appeared that the inadequacy identified in Item 1 of CPF 1-2015-1007M was corrected. EGTS questions why the changes that were made to the Integrity Management Program for the natural gas pipeline system for compliance with §192.915(b)(2) which were proactively applied to the Integrity Management Program for the hazardous liquid pipeline system for compliance with §195.452(f)(8) and were deemed acceptable by PHMSA on 6/30/2015 following its review of the EGTS response to CPF 1-2015-1007M are now allegedly inadequate by PHMSA. EGTS maintains that the alleged inadequacy described for PIP-3702, specifically the section regarding the essential functions of the Pipeline Integrity Engineer, in PHMSA's commentary for Item 3 of CPF-2025-046-NOA did not render PIP-3702 inadequate to ensure the safe operation of a pipeline facility at the time of the inspection as it was sufficiently in compliance with §195.452(f)(8) and PHMSA had previously indicated on 6/30/2015 that the changes that were made to the Integrity Management Program for the natural gas pipeline system for compliance with §192.915(b)(2) in response to Item 1 of CPF 1-2015-1007M which were proactively applied by EGTS to the Integrity Management Program for the hazardous liquid pipeline system for compliance with §195.452(f)(8) had corrected the inadequacy identified in Item 1 of CPF 1-2015-1007M.

A copy of PIP-3702 is included in this response along with Notice of Amendment CPF 1-2015-1007M (dated 4/15/2015), Operator Response to Notice of Amendment CPF 1-2015-1007M (dated 5/15/2015), and Closure Letter for Notice of Amendment CPF 1-2015-1007M (dated 6/30/2015).

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 determination 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 adequate to ensure safe operations 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 EGTS'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 EGTS records its official records on, the locations these records will be retained at, and how EGTS can access its records. When PHMSA requested further information on which records EGTS maintains for inspection, EGTS 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. EGTS 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 (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, EGTS'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 EGTS 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 EGTS records its official records on, the locations these records will be retained at, and how EGTS can access its records.

EGTS Response: Following the inspection, EGTS revised PIP-3509 (Record Keeping) to include Section 5.3 which contains a table specifying the list of records maintained for the Integrity Management Program for the hazardous liquid pipeline system (i.e. the 'Record Generated' column in the table), how those records are generated (i.e. the 'Inputs' column in the table), who is responsible for generating those records (i.e. the 'Who Inputs' column in the table), the format of those records (i.e. the 'Output' column in the table), and the location(s) where those records are maintained (i.e. the 'Storage Location' column in the table). EGTS maintains that the alleged inadequacy described for PIP-3509, in PHMSA's commentary for Item 4 of CPF-2025-046-NOA did not render PIP-3509 inadequate to ensure the safe operation of a pipeline facility at the time of the inspection as it necessitated a relatively minor procedural change involving the compilation of existing record keeping practices into a table.

A copy of the revised PIP-3509 is included with this response.

If you have any questions, concerns, or should require additional information, please contact Dan Stahl at 681-842-3365 (office) or 304-266-6062 (mobile).



Eastern Gas Transmission and Storage, Inc.
925 White Oaks Blvd.
Bridgeport, WV 26330

Respectfully,

A handwritten signature in blue ink that reads "Eric V. Taylor".

Eric Taylor
Director, Pipeline Integrity & Records
Eastern Gas Transmission and Storage, Inc.