

February 27, 2026

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 1-2026-012-NOPV

Dear Mr. Burrough:

Please find the Eastern Gas Transmission and Storage, Inc. (EGTS) response to the following alleged probable violation that was identified in Notice of Probable Violation and Proposed Compliance Order CPF 1-2026-012-NOPV, dated February 6, 2026.

1. § 195.452 Pipeline integrity management in high consequence areas.

(a)

(b) ***What program and practices must operators use to manage pipeline integrity? Each operator of a pipeline covered by this section must:***

(1)

(5) Implement and follow the program.

EGT&S failed to follow its integrity management program in accordance with section 195.452(b)(5). Specifically, EGT&S failed to conduct and document a periodic review of its preventative and mitigative (P&M) measures, failed to propose new P&M measures for consideration of implementation, and failed to document the decision-making process regarding measures not selected for implementation as required by section 5.2.7 in its integrity management program, PIP-3506 – Preventative and Mitigative Measures (12/27/24) (P&M Procedure).

During the inspection, PHMSA requested records demonstrating that EGT&S had conducted the requisite periodic review of its P&M measures. EGT&S's P&M Procedure, section 5.2.7, required that EGT&S conduct a periodic review to: (1) evaluate existing P&M measures; (2) propose new P&M measures for implementation; and (3) discuss P&M measures considered but not implemented. EGT&S's PIP-3616 Process to Identify Additional P&M Actions on Hazardous Liquid Pipelines (12/27/24) (P&M Flowchart) required that this review be formally documented at "Step 26".

When PHMSA requested documentation of the periodic review, EGT&S stated that the review process is conducted via emails and spreadsheets, though they noted this methodology is not detailed in their written procedures. EGT&S then provided two records: LIMP P&M Measures Evaluation Distribution Email (11/16/22) (12/15/23) (P&M Email) and PIP-3506 Section Excel Spreadsheet (2024) (P&M Spreadsheet).

However, the records provided by EGT&S failed to demonstrate compliance with section 5.2.7 of the P&M Procedure. The P&M Email constitutes only the initiation of a request for information; it does not represent a completed review. While it establishes that a review was launched, EGT&S provided no subsequent correspondence, meeting minutes, or response emails to demonstrate that the P&M periodic review was conducted, discussed, or concluded.

The P&M Spreadsheet is a static inventory of P&M measures rather than a record of evaluation. It lists various P&M measure but fails to contain timestamps, authorship, or decision logic indicating when these measures were reviewed or how their continued effectiveness was evaluated. Section 5.2.7 requires a discussion of P&M measures not considered for implementation. The provided records contain no data regarding measures that were proposed and subsequently rejected. Without a record of the alternatives considered and the rationale for their rejection, EGT&S cannot demonstrate compliance with section 5.2.7. When PHMSA requested further records regarding the P&M measure periodic review, EGT&S was unable to provide additional records.

Moreover, EGT&S failed to provide records that included specific details on each current P&M measure. For example, section 5, table 1 of the P&M Procedure does not list specific implemented P&M measures but instead references generic company compliance procedures. Similarly, the P&M Spreadsheet fails to indicate when specific P&M measures were identified, the date of implementation, or their current status (e.g., active, pending, or completed).

Compounding these documentation failures, section 5.2.7 of the P&M Procedure was inadequate because it failed to define the term “periodic” or establish a specific time interval for the required periodic review. By failing to specify a frequency and failing to include detailed steps for how the review is to be conducted and documented, the procedure failed to ensure the consistent and verifiable implementation of the process. This lack of specificity contributed to EGT&S’s failure to generate records demonstrating that the required P&M measure periodic review actually occurred.

Therefore, EGT&S failed to follow its integrity management program in accordance with section 195.452(b)(5).

EGTS Response:

Following the inspection, the following revision were made to PIP-3506 (Preventative and Mitigative Measures).

- PIP-3506, Section 5.2 was revised to eliminate Table 1 which contained a listing of the standard operating procedures and work procedures associated with the preventative measures that are currently implemented for the hazardous liquid pipelines.
- PIP-3506, Section 5.3 was revised to include a detailed listing of and descriptions for the specific preventative measures that are currently implemented for the hazardous liquid pipelines. The listing of and descriptions for the specific preventative measures that are currently implemented for the hazardous liquid pipelines that were previously contained in PIP-3506, Section 5.2 were moved to PIP-3506, Section 5.3 and revised. The content that was previously contained in PIP-3506, Section 5.3 was moved to PIP-3506, Section 5.4 and the

content that was previously contained in PIP-3506, Section 5.4 was moved to PIP-3506, Section 5.5.

- PIP-3506, Section 5.5 was revised to provide clarification that the reviews of the preventative and mitigative measures for the hazardous liquid pipelines are conducted annually, not to exceed 15 months.

A copy of the revised PIP-3506 is included with this response.

Following the inspection, EGTS conducted its annual risk assessment and preventative and mitigative measures review meeting for CY2025 on 11/13/2025. The annual risk assessment and preventative and mitigative measures review meeting for CY2025 involved a review of the risk assessment results for the hazardous liquid pipelines from 2025, a review of the preventative and mitigative measures that are currently implemented for the hazardous liquid pipelines, consideration of potential additional preventative and mitigative measures that have not been implemented for the hazardous liquid pipelines, and documentation of the decision to select or not select the potential additional preventative and mitigative measures for implementation for the hazardous liquid pipelines.

The record of the annual risk assessment and preventative and mitigative measures review meeting for CY2025 which was conducted on 11/13/2025 is included with this response.

Historically, EGTS implemented numerous preventative and mitigative measures for the hazardous liquid pipelines, some of which were not Part 195 regulatory requirements at the time of implementation but are now Part 195 regulatory requirements. Examples of such implemented preventative and mitigative measures, specifically for the G-134 and G-136 pipelines which constitute the hazardous liquid pipelines that are operated by EGTS and are jurisdictional to PHMSA, include the following: installation of a computational pipeline monitoring leak detection system for G-134 and G-136, installation of 21 line break valves (i.e. automatic shutoff valves) at gate sites along the entire length of G-134 and G-136 with the functionality to automatically isolate section(s) of G-134 and G-136 in the event of an unplanned decrease in operating pressure, conducting foot patrols of the entire length of G-134 and G-136 on a quarterly basis, conducting aerial patrols of the entire length of G-136 and G-136 on a biweekly basis, conducting close interval surveys on a quinquennial basis in alignment with the frequency for conducting integrity assessments, and conducting maintenance pigging on an annual basis. The detailed listing of and descriptions for the specific preventative measures that are currently implemented for the hazardous liquid pipelines is contained in PIP-3506, Section 5.3.

It is also noted that EGTS currently identifies the entire length of each of the hazardous liquid pipelines as a high consequence area. Accordingly, integrity assessments are conducted on the entire length of each of the hazardous liquid pipelines. The integrity assessment method utilized for the G-134 and G-136 pipelines is in-line inspection.



Eastern Gas Transmission and Storage, Inc.
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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).

Respectfully,

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

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