



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: bgray@dgoc.com

February 24, 2026

Bradley Gray
Executive VP/COO
Cranberry Pipeline Corporation
1800 Corporate Drive
Birmingham, AL 35242

CPF 1-2026-021-NOA

Dear Mr. Gray:

From August 12 through 14, 2025, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Cranberry Pipeline Corporation's (CPC)¹ Heizer Creek Storage and Maxton underground natural gas storage facilities (UNGSF) in Putnam and Raleigh Counties, West Virginia.

As a result of the inspection, PHMSA has identified an apparent inadequacy found within CPC's plans or procedures. The alleged inadequacy and proposed revision is described below:

1. § 192.12 Underground natural gas storage facilities.

Underground natural gas storage facilities (UNGSFs), as defined in § 192.3, are not subject to any requirements of this part aside from this section.

(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.

¹ CPC is a subsidiary of Diversified Midstream LLC.

CPC's written procedures for conducting operations and maintenance activities were inadequate to ensure safe operation of a pipeline facility in accordance with section 192.12(c). Specifically, CPC failed to have procedures describing how it monitors for the presence of annular gas at 14 wells without an annulus monitoring port, as required by section 9.3.2 in API RP 1171 (1st edition).

Section 9.3.2 states that "[t]he operator shall monitor for presence of annular gas by measuring and recording annular pressure and/or annular gas flow. The operator shall evaluate each annular gas occurrence that exceeds operator- or regulatory-defined threshold levels determined from well integrity evaluation and from risk assessment."

During the inspection, CPC identified that monitoring of annulus pressure or flow was addressed in the following documents:

- *Document No. PR-A-05, Storage Integrity Management Plan, Rev-1 (02/01/2025)*. Section 8.3.4 stated that CPC "shall monitor for presence of annular gas by measuring and recording annular pressure and/or annular gas flow. [CPC] should test wellhead seals when annulus pressure is detected and where injectable packing and/or test ports are present."
- *Document No. PR-A-11, O&M Procedure, UNGSF Annular Pressure Recording, section 8, Rev-1 (02/01/2025)*. Section 8.2.3 stated that "[i]f annular pressure cannot be obtained, note the reason pressure cannot be obtained (ex. no valve, valve left open, inaccessible, inoperable, etc.) and skip to 8.4." Section 8.4.1 stated that "[i]f there is no annular valve and/or the annulus is open, visually, and audibly check for gas flow from the annulus."

However, 14 of the 16 inspected wells did not have annulus valves and piping extensions to monitor the annulus pressure or flow. During the inspection, CPC stated that it conducts a wellhead ground-level leakage survey with a calibrated gas detection instrument at these locations. However, there was no procedure to detail this monitoring practice or specify the operator-defined investigation/remediation gas concentration threshold at the 14 wells without an annulus monitoring port.

Therefore, CPC's written procedures for conducting operations and maintenance activities were inadequate to ensure safe operation of a pipeline facility in accordance with section 192.12(c). PHMSA proposes that CPC amend its procedures to include leakage surveys as a method to monitor for the presence of annular gas at each well, and define investigation/remediation gas concentration thresholds.

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 Cranberry Pipeline Corporation 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, Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2026-021-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

ROBERT THOMAS
BURROUGH

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THOMAS BURROUGH
Date: 2026.02.24 11:28:25
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Robert Burrough
Director, Eastern Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

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