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03/26/2026

**Via Electronic Mail and Overnight Delivery Service**

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

**RE: Notice of Probable Violation (NOPV) and Proposed Compliance Order  
CPF 1-2026-022-NOPV**

Dear Mr. Burrough:

Cranberry Pipeline Corporation WV respectfully submits this written response pursuant to CPF 1-2026-022-NOPV, as requested in the Administration's Notice of Amendment dated February 24, 2026. Diversified Midstream LLC ("Diversified Midstream"), OPID 39619, and its subsidiary Cranberry Pipeline Corp (WV) ("Cranberry Pipeline"), OPID 2859 (collectively the "Company") hereby respectfully provide the following response (the "Response") to the issues and inadequacies noted during PHMSA's August 12–14, 2025 inspection of the Heizer Creek and Maxton underground natural gas storage facilities .

During the time period evaluated in the NOPV, the Company's integrity-management activities were guided by the first edition of API RP 1171, which was then the version formally incorporated by reference into 49 CFR § 192.7. Cranberry Pipeline followed this earlier guidance in good faith, including its risk-informed and phased approach to storage well integrity evaluations. Following PHMSA's incorporation by reference of the revised (second edition) API RP 1171, adopted via Direct Final Rule on July 1, 2025, and taking effect January 1, 2026, Cranberry Pipeline updated its program to fully align with the revised requirements.

**I. Response to PHMSA's Allegation Under 49 CFR § 192.12(d)(2)**

PHMSA observed that the Company did not complete baseline risk assessments for at least 40% of its UNGSF wells by the March 13, 2024, deadline. The Company acknowledges PHMSA's concern and recognizes the importance of robust mechanical integrity data to support baseline risk assessments.

At the time these assessments were being developed, the Company used the data sources and sequencing permitted under the first edition of API RP 1171, including well construction information, pressure histories, reservoir data, and surface integrity indicators. Because legacy wells did not possess



downhole mechanical integrity evaluations (MIEs) that met the standard requirements; the Companies' reliance on available data reflected the earlier framework in effect before PHMSA's 2025–2026 regulatory updates.

Cranberry Pipeline Corporation WV appreciates PHMSA's clarification that more comprehensive downhole data is expected under the current regulatory requirements and is undertaking the necessary programmatic amendments to incorporate that expectation into its revised integrity program.

## **II. Updated Compliance Approach Under the Revised API RP 1171**

After PHMSA adopted the second edition of API RP 1171, Cranberry Pipeline promptly revised its Storage Integrity Management Plan (SIMP) and accelerated its mechanical integrity evaluations. The updated RP 1171 provides enhanced direction for risk-based sequencing, including the prioritization of higher-risk wells for early MIEs.

The Company has now scheduled downhole mechanical integrity logging for its seven highest-risk wells, ensuring that the wells presenting the most significant risk are addressed first in accordance with both § 192.12(d)(2) and the updated API standard.

## **III. Response to PHMSA's Proposed Compliance Order (49 U.S.C. § 60118)**

PHMSA proposes the following remedial action:

**“CPC must complete the baseline risk assessment for the seven highest-risk wells by September 26, 2026, or within 180 days of receipt of the Final Order, whichever is later.”**

The Company agrees to this requirement and confirms that the proposed schedule aligns with the companies' revised implementation plan. The Company has initiated contracting, well access planning, and evaluation sequencing to ensure timely completion. The Company is committed to meeting or exceeding PHMSA's deadlines.

## **IV. Conclusion**

The Company reiterates its commitment to full compliance with PHMSA's safety regulations and appreciates the clarity provided in the NOPV and proposed Compliance Order. The Company respectfully notes that its earlier actions were based on the version of API RP 1171 incorporated by reference at that time, and the company has now fully aligned its practices with the revised standard adopted by PHMSA.

The Company is committed to continued collaboration with PHMSA and will complete the baseline risk assessments for the seven highest-risk wells within the timeframe specified under the proposed Compliance Order, while continuing to strengthen the safety and reliability of its underground natural gas storage operations.



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I trust that this additional information satisfactorily answers the allegations and concerns contained within this CPF 1-2026-022-NOPV. As needed, I can be reached via email at [jsbailey@dgoc.com](mailto:jsbailey@dgoc.com) or by phone at 330-896-8510, Ext 329.

Sincerely,

A handwritten signature in blue ink that reads "James S. Bailey".

James S. Bailey  
VP, Midstream Operations (Compliance)