



May 8, 2026

(Via Email Only)

Mr. Robert Burrough
Director, Eastern Region,
Office of Pipeline Safety, PHMSA
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
Robert.burrough@dot.gov

RE: CPF 1-2026-034-WL

Dear Mr. Burrough,

National Fuel Gas Supply Corporation ("National Fuel" or the "Company") is in receipt of and has reviewed the Warning Letter dated March 18, 2026 (received April 8, 2026), CPF 1-2026-034-WL (the "Warning Letter"). On June 11 and 12, 2025, a PHMSA representative inspected National Fuel's FlexSteel gas transmission pipeline located in McKean, Elk and Cameron Counties, Pennsylvania, which operates under Special Permits PHMSA-2017-0090 and PHMSA-2021-0042 (collectively the "Special Permits"). The resulting Warning Letter alleges that National Fuel committed probable violations of Pipeline Safety Regulations, Title 49, Code of Federal Regulations. Safety is a core value of National Fuel, and the Company fosters a safety-first culture built on awareness, action and accountability. The Company and its employees are committed to the highest levels of system safety, and the Company would like to take this opportunity to respond to the Warning Letter. Below, please find National Fuel's response to the alleged probable violations and an illustration of National Fuel's ongoing commitment to safety.

PHMSA Finding

1. Condition 6: Corrosion Control

a) ...

c) NFG must perform external corrosion control monitoring on each buried metallic fitting in accordance with 49 CFR 192.465. NFG must perform CP monitoring at least once each calendar year, not exceeding 15 months. Corrosion control monitoring of the buried metallic fittings by a sampling basis is not permitted.

PHMSA alleges that National Fuel failed to properly perform external corrosion control monitoring on each buried metallic fitting in accordance with Condition 6.c of the Special Permits. Specifically, PHMSA alleges National Fuel documented invalid native or depolarized corrosion potential measurements for eight test stations (i.e., 9976, 9988, 9989, 9990, 9991, 9992, 9993, and 11147) with voltage potentials ranging from -809 mV to -1441 mV.

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National Fuel Response

National Fuel respectfully submits that there is no probable violation of Condition 6.c. Cathodic protection monitoring of each buried metallic fitting was performed at the proper frequency in accordance with 49 CFR §192.465. Furthermore, as required by 49 CFR §192.463, cathodic protection was provided in compliance with one or more of the applicable criteria contained in 49 CFR 192 Appendix D ("Appendix D"). Specifically, all test stations covered by the Special Permits, including the eight test stations identified by PHMSA in the Warning Letter, had a negative pipe-to-soil potential of at least -850 mV and appropriate interpretation of voltage measurement in line with Appendix D(l)(A)(1). Therefore, not only was cathodic protection monitoring performed pursuant to 192.465, but in all instances, National Fuel's cathodic protection met one of the criteria, as required, under 192.463.

Native pipe-to-soil potential measurements (i.e. the natural potential of an underground pipe before application of a cathodic protection system) may be influenced by adjacent or nearby direct electrical current sources (i.e., energized cathodic protection systems of foreign operators). For National Fuel, the eight locations mentioned above are in geographical areas with multiple electric current sources nearby. Thus, although the native potentials at these locations were measured as required by the Special Permits, National Fuel was unable to de-energize the cathodic protection systems of the nearby foreign operator's facilities when the time came to take these reads, resulting in native potentials with values that differed from those observed along the remainder of the pipeline. However, as described above, there are multiple acceptable cathodic protection criteria, and the criterion allowing for -850 mV was applied.

In addition to the -850 mV criterion described above, the 100 mV polarization shift is another acceptable cathodic protection criterion under Appendix D. At times, National Fuel has utilized the 100 mV polarization shift criterion which requires native potential measurements, for the segments covered under the Special Permits. In this instance, the 100mV polarization shift criterion was not applied because the native potentials were influenced by nearby, foreign current sources. Thus, although the native potentials were in fact measured, the Company elected not to utilize the 100 mV polarization shift criterion at these eight locations and, instead, evaluated cathodic protection using another acceptable method—the -850 mV criterion, which is an authorized method under 192.465 and as described above. Thus, National Fuel measured the native potentials at the eight locations in question but did not rely on those reads due to them being influenced by sources controlled by operators other than National Fuel.

Finally, as indicated in its Written Preliminary Findings response, National Fuel completed interrupted cathodic protection measurements in 2025, which is another valid method under 194.463 and Appendix D. No deficiencies were discovered during application of this method. National Fuel has always complied with 194.465, and in turn, 194.463 and Appendix D for this segment, and going forward, National Fuel will continue to apply at least one of the acceptable cathodic protection criteria for its future testing and measurement.

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National Fuel thanks PHMSA for the opportunity to respond to this Warning Letter, further explain its approach to evaluating proper cathodic protection at these locations, and reaffirm its ongoing commitment to safety.

Respectfully,

DocuSigned by:
Ramon P. Harris Jr.
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Ramon P. Harris, Jr.
Chief Safety Officer and Vice President
National Fuel Gas Supply Corporation