



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

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

WARNING LETTER

VIA EMAIL TO: drm@calichestorage.com

April 8, 2026

Dave Marchese, CEO
Golden Triangle Storage, LLC
919 Milam Street, Suite 2425
Houston, TX 77002

CPF 1-2026-045-WL

Dear Mr. Marchese:

On November 16, 2025, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), Eastern Region, pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Golden Triangle Storage, LLC's (GTS or Respondent) Underground Natural Gas Storage Facility (UNGSF) in Houston, Texas.

As a result of the inspection, it is alleged that GTS has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR) Part 192. The item inspected and the probable violation is:

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) *Salt cavern UNGSFs.*
 - (1) ...
 - (3) Each UNGSF that uses a solution-mined salt cavern for natural gas storage and was constructed on or before July 18, 2017, must meet the provisions of API RP 1170 (incorporated by reference, *see* § 192.7), sections 9, 10, and 11, and paragraph (c) of this section, by January 18, 2018, and must meet all provisions of section 8 of API RP 1171 (incorporated by reference, *see* § 192.7) that are applicable to the physical characteristics and operations of a solution-mined salt cavern UNGSF, and paragraph (d) of this section, by March 13, 2021.

GTS failed to meet all provisions of section 8 in API RP 1171 that are applicable to the physical characteristics and operations of a solution-mined salt cavern UNGSF for its UNGSF that uses a solution-mined salt cavern for natural gas storage and was constructed on or before July 18, 2017, in accordance with section 192.12(a)(3). Specifically, GTS failed to assess threat and hazard interaction in accordance with API RP 1171 section 8.3.2.

Section 8.3.2 in API RP 1171 required the operator to use available information to assess threat and hazard interaction. During the inspection, PHMSA reviewed GTS's *Cavern Integrity and Risk Management Plan* (October 2025) (Risk Management Plan). Section 4.1.1 in the Risk Management Plan stated that GTS uses available information to assess threat and hazard interaction. However, during the record review, GTS's Risk Assessment Model lacked any threat and hazard interaction assessment. In addition, GTS noted that it failed to meet this requirement in the Cavern Annual Risk Assessment Form completed on November 10, 2025, which stated, "it is understood that the model employed does not perform an interactive threat analysis that would further characterize facility and operational risk."

Therefore, GTS failed to meet all provisions of section 8 in API RP 1171 that are applicable to the physical characteristics and operations of a solution-mined salt cavern UNGSF for its UNGSF that uses a solution-mined salt cavern for natural gas storage and was constructed on or before July 18, 2017, in accordance with section 192.12(a)(3).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, Respondent is subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violations occurring on or after December 28, 2023 and before December 30, 2024 the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violations occurring on or after January 6, 2023 and before December 28, 2023 the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violations occurring on or after March 21, 2022 and before January 6, 2023 the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violations occurring on or after May 3, 2021 and before March 21, 2022 the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violations occurring on or after January 11, 2021 and before May 3, 2021 the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violations occurring on or after July 31, 2019 and before January 11, 2021 the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise Respondent to correct the item identified in this letter. Failure to do so will result in Golden Triangle Storage, LLC being subject to additional enforcement action.

No reply to this letter is required. If Respondent chooses to reply, in Respondent's correspondence please refer to **CPF 1-2026-045-WL**. Be advised that all material Respondent submits in response to this enforcement action is subject to being made publicly available. If Respondent believes that any portion of its responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document, Respondent must provide a second copy of the document with the portions it believes qualify for confidential treatment redacted and an explanation of why Respondent believes the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Sincerely,

ROBERT THOMAS
BURROUGH

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THOMAS BURROUGH
Date: 2026.04.08 11:04:29
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Robert Burrough
Director, Eastern Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: Darrell Hall, VP of Operations, GTS, dhall@calichestorage.com
Afton Sterling, VP of Regulatory, Environmental, Health & Safety, GTS,
asterling@calichestorage.com