



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

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NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: CharlesL@KFOC.net

June 30, 2026

Mr. Don Millican
Vice President/CFO
Wyckoff Gas Storage Company, LLC
6733 S. Yale Avenue
Tulsa, Oklahoma 74136

CPF 1-2026-049-NOA

Dear Mr. Millican:

From April 8 2025 through August 7, 2025, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, conducted an inspection of Wyckoff Gas Storage Company, LLC's (Wyckoff) procedures, records, and facilities in Greenwood, New York.

As a result of the inspection, PHMSA has identified apparent inadequacies within Wyckoff's plans or procedures. The items inspected and the inadequacies are described below:

- 1. § 191.23 Reporting safety-related conditions.**
(a) Except as provided in paragraph (b) of this section, each operator shall report in accordance with § 191.25 the existence of any of the following safety-related conditions involving facilities in service:

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's *Operations and Maintenance Manual* (Jan. 2022) ("O&M Plan") failed to include adequate procedures for reporting safety related conditions in accordance with § 191.23(a).

During the inspection, PHMSA's inspector reviewed Wyckoff's O&M Plan. Section P191.23, "Reporting Safety Related Conditions" failed to assign a responsible party for reporting safety-related conditions.

Therefore, PHMSA proposes to require that Wyckoff revise its O&M Plan to identify a party responsible for reporting safety-related conditions.

2. § 191.5 Immediate notice of certain incidents.

(a) At the earliest practicable moment following discovery, but no later than one hour after confirmed discovery, each operator must give notice in accordance with paragraph (b) of this section of each incident as defined in § 191.3.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for reporting incidents at the earliest practicable moment following discovery, but no later than one hour after confirmed discovery in accordance with § 191.5(a).

Wyckoff's O&M Plan, Section P-191.5, "Incident Notification, Reporting and Investigation" instructs personnel to give notice of a reportable incident at the earliest practicable moment, but fails to instruct personnel that this must be performed no later than one hour after confirmed discovery.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include adequate procedures for reporting incidents at the earliest practicable moment following discovery, but no later than one hour after confirmed discovery in accordance with § 191.5(a).

3. § 192.13 What general requirements apply to pipelines regulated under this part?

(a)

(d) Each operator of an onshore gas transmission pipeline must evaluate and mitigate, as necessary, significant changes that pose a risk to safety or the environment through a management of change process. Each operator of an onshore gas transmission pipeline must develop and follow a management of change process, as outlined in ASME B31.8S, section 11 (incorporated by reference, see § 192.7), that addresses technical, design, physical, environmental, procedural, operational, maintenance, and organizational changes to the pipeline or processes, whether permanent or temporary. A management of change process must include the following: reason for change, authority for approving changes, analysis of implications, acquisition of required work permits, documentation, communication of change to affected parties, time limitations, and qualification of staff. For pipeline segments other than those covered in subpart O of this part, this management of change process must be implemented by February 26, 2024. The requirements of this paragraph (d) do not apply to gas gathering pipelines. Operators may request an extension of up to 1 year by submitting a notification to PHMSA at least 90 days before February 26, 2024, in accordance with § 192.18. The notification must include a reasonable and technically justified basis, an up-to-date plan for completing all actions

required by this section, the reason for the requested extension, current safety or mitigation status of the pipeline segment, the proposed completion date, and any needed temporary safety measures to mitigate the impact on safety.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include a procedure for management of change processes in accordance with § 192.13(d).

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include a management of change process in accordance with § 192.13(d).

4. § 192.225 Welding procedures.

(a) Welding must be performed by a qualified welder or welding operator in accordance with welding procedures qualified under section 5 (except for Note 2 in section 5.4.2.2), section 12, Appendix A or Appendix B of API Std 1104 (incorporated by reference, see § 192.7), or section IX of the ASME Boiler and Pressure Vessel Code (ASME BPVC) (incorporated by reference, see § 192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures must be determined by destructive testing in accordance with the applicable welding standard(s).

(b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.

Wyckoff's written procedures were inadequate to ensure safe operation of its pipeline facility. Specifically, Wyckoff's O&M Plan failed to include detailed welding procedures and the applicable welding standard in accordance with § 192.225.

Wyckoff's O&M Plan Section P-192.225, "Pipeline Welding," while referencing API 1104 and ASME Boiler and Pressure Vessel Code (BPVC) Section IX, failed to incorporate the specific requirements of those standards, and failed to include detailed welding procedures which provide the specific parameters for welding made pursuant to the procedure.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include detailed welding procedures and the applicable welding standard in accordance with § 192.225.

5. § 192.3 Definitions.

Moderate consequence area means:

(1) An onshore area that is within a potential impact circle, as defined in § 192.903, containing either:

- (i) Five or more buildings intended for human occupancy; or**
- (ii) Any portion of the paved surface, including shoulders, of a designated interstate, other freeway, or expressway, as well as any other principal arterial roadway with 4 or more lanes, as defined in the Federal Highway**

Administration's Highway Functional Classification Concepts, Criteria and Procedures, Section 3.1 (see:

https://www.fhwa.dot.gov/planning/processes/statewide/related/highway_functional_classifications/fcauab.pdf, and that does not meet the definition of high consequence area, as defined in § 192.903.

(2) The length of the moderate consequence area extends axially along the length of the pipeline from the outermost edge of the first potential impact circle containing either 5 or more buildings intended for human occupancy; or any portion of the paved surface, including shoulders, of any designated interstate, freeway, or expressway, as well as any other principal arterial roadway with 4 or more lanes, to the outermost edge of the last contiguous potential impact circle that contains either 5 or more buildings intended for human occupancy, or any portion of the paved surface, including shoulders, of any designated interstate, freeway, or expressway, as well as any other principal arterial roadway with 4 or more lanes

§ 192.710 Transmission lines: Assessments outside of high consequence areas.

(a) **Applicability:** This section applies to onshore steel transmission pipeline segments with a maximum allowable operating pressure of greater than or equal to 30% of the specified minimum yield strength and are located in:

- (1) A Class 3 or Class 4 location; or
- (2) A moderate consequence area as defined in § 192.3, if the pipeline segment can accommodate inspection by means of an instrumented inline inspection tool (i.e., “smart pig”).

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's procedures failed to include a procedure for defining and identifying Moderate Consequence Areas (MCAs) in accordance with §§192.3 and 192.710(a)(2).

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include a procedure for defining and identifying Moderate Consequence Areas (MCAs) in accordance with §§192.3 and 192.710(a)(2).

6. § 192.303 Compliance with specifications or standards.

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

§ 192.199 Requirements for design of pressure relief and limiting devices.

Except for rupture discs, each pressure relief or pressure limiting device must:

- (a) Be constructed of materials such that the operation of the device will not be impaired by corrosion;
- (b) Have valves and valve seats that are designed not to stick in a position that will make the device inoperative;

(c) Be designed and installed so that it can be readily operated to determine if the valve is free, can be tested to determine the pressure at which it will operate, and can be tested for leakage when in the closed position;

(d) Have support made of noncombustible material;

(e) Have discharge stacks, vents, or outlet ports designed to prevent accumulation of water, ice, or snow, located where gas can be discharged into the atmosphere without undue hazard;

(f) Be designed and installed so that the size of the openings, pipe, and fittings located between the system to be protected and the pressure relieving device, and the size of the vent line, are adequate to prevent hammering of the valve and to prevent impairment of relief capacity;

(g) Where installed at a district regulator station to protect a pipeline system from overpressuring, be designed and installed to prevent any single incident such as an explosion in a vault or damage by a vehicle from affecting the operation of both the overpressure protective device and the district regulator; and

(h) Except for a valve that will isolate the system under protection from its source of pressure, be designed to prevent unauthorized operation of any stop valve that will make the pressure relief valve or pressure limiting device inoperative.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's written procedures failed to include requirements for design of pressure relief and limiting devices in accordance with §§ 192.303 and 192.199.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include requirements for design of pressure relief and limiting devices in accordance with §§ 192.303 and 192.199.

7. § 192.465 External corrosion control: Monitoring and remediation.

(a)

(d) Each operator must promptly correct any deficiencies indicated by the inspection and testing required by paragraphs (a) through (c) of this section. For onshore gas transmission pipelines, each operator must develop a remedial action plan and apply for any necessary permits within 6 months of completing the inspection or testing that identified the deficiency. Remedial action must be completed promptly, but no later than the earliest of the following: prior to the next inspection or test interval required by this section; within 1 year, not to exceed 15 months, of the inspection or test that identified the deficiency; or as soon as practicable, not to exceed 6 months, after obtaining any necessary permits.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include a procedure for remedial action plans in accordance with § 192.465(d).

Wyckoff's O&M Plan, Section P-192.455, "External Corrosion Control" states in relevant part:

"Remedial Action

When cathodic protection levels are discovered to be below established criteria levels, take remedial action to restore cathodic protection to acceptable levels. Consider the particular problem affecting pipeline integrity in completing the remedial action. Any remedial action necessary to facilitate the effective application of corrosion control must not extend 15 months beyond discovery.

If the remaining pipe wall thickness is less than that required to substantiate the MAOP of the pipeline, one of the following will be done:

- 1. Pipeline segment replaced.*
- 2. MAOP reduced based on actual remaining wall thickness.*
- 3. Pipe repaired according to Procedure P-192.711: Pipeline Repair Procedures.*

The remaining strength of the correct pipe will be determined using ASME B-31G or RESTRENG, as long as the corroded sections do not penetrate the pipe wall."

Section P-192.455 failed to require application for any necessary permits within 6 months, and failed to require that remedial action be completed no later than the earliest of the following: prior to the next inspection or test interval required by this section; within 1 year, not to exceed 15 months, of the inspection or test that identified the deficiency; or as soon as practicable, not to exceed 6 months, after obtaining any necessary permits.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to require application for any necessary permits within 6 months, and to require that remedial action be completed no later than the earliest of the following: prior to the next inspection or test interval required by this section; within 1 year, not to exceed 15 months, of the inspection or test that identified the deficiency; or as soon as practicable, not to exceed 6 months, after obtaining any necessary permits.

8. § 192.481 Atmospheric corrosion control: Monitoring.

(a) Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

Pipeline type:	Then the frequency of inspection is:
(1) Onshore other than a Service Line	At least once every 3 calendar years, but with intervals not exceeding 39 months.
(2) Onshore Service Line	At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in paragraph (d) of this section.
(3) Offshore	At least once each calendar year, but with intervals not exceeding 15 months.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for inspection and evaluation of each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion in accordance with § 192.481(a)(1).

Wyckoff's O&M Plan, Section P-192.479, "Protection Against Atmospheric Corrosion" contains guidance for the grading of the atmospheric corrosion on above ground pipelines with three conditions: good, fair and poor. Section P-192.479 requires the completion of a companion form, Form F-192.481, only upon discovery of a poor condition. However, operators must maintain a record of each inspection required by Subpart I in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist for at least 5 years in accordance with § 192.491(c).

In addition, Form F-192.481 does not contain adequate guidance for personnel to appropriately grade poor, fair or good conditions, and contains additional grading information not noted or explained in Section P-192.479. The form also has no clear space to indicate which facility was inspected with either a milepost, station number, or location name.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include adequate procedures for inspection and evaluation of each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion in accordance with § 192.481(a)(1).

9. § 192.485 Remedial measures: Transmission lines.

(a) General corrosion. Each segment of transmission line with general corrosion and with a remaining wall thickness less than that required for the MAOP of the pipeline must be replaced or the operating pressure reduced commensurate with the strength of the pipe based on actual remaining wall thickness. However, corroded pipe may be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe. Corrosion pitting so closely grouped as to affect the overall strength of the pipe is considered general corrosion for the purpose of this paragraph.

(b) Localized corrosion pitting. Each segment of transmission line pipe with localized corrosion pitting to a degree where leakage might result must be replaced or repaired, or the operating pressure must be reduced commensurate with the strength of the pipe, based on the actual remaining wall thickness in the pits.

(c) Calculating remaining strength. Under paragraphs (a) and (b) of this section, the strength of pipe based on actual remaining wall thickness must be determined and documented in accordance with § 192.712.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for repair or replacement of transmission lines with general corrosion and a remaining wall thickness less than that required for the MAOP of the pipeline in accordance with § 192.485.

Wyckoff's O&M Plan, Section P192.711, "Pipeline Repair Procedures" failed to include adequate procedures for evaluation of pipeline anomalies or damage such as determining remaining wall strength, evaluation of cracks, and evaluation of dents. The section addresses evaluation of anomalies or damage in (4) sub-sections: Corrosion, Dents, Gouges, and Other Defects. The Corrosion subsection fails to include instructions or requirements for measuring corrosion depth. The Dent subsection fails to include procedure to determine strain levels. The Other Defects subsection contains no procedure for evaluation of cracks or crack like anomalies, and instead contains only information about types of defects and reporting requirements.

Wyckoff indicated to PHMSA personnel that, if evaluation were necessary, a third party would be consulted for determining the condition severity and appropriate repair. However, without its own standards or requirements in place, Wyckoff's procedures fail to ensure that such evaluation would occur in accordance with the requirements of § 192.485.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include adequate procedures for evaluation of pipeline anomalies or damage.

10. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a)

(c) Abnormal operation. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:

(1) Responding to, investigating, and correcting the cause of:

(i) Unintended closure of valves or shutdowns;

(ii) Increase or decrease in pressure or flow rate outside normal operating limits;

(iii) Loss of communications;

(iv) Operation of any safety device; and

(v) Any other foreseeable malfunction of a component, deviation from normal operation, or personnel error, which may result in a hazard to persons or property.

(2) Checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation.

(3) Notifying responsible operator personnel when notice of an abnormal operation is received.

(4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

(5) The requirements of this paragraph (c) do not apply to natural gas distribution operators that are operating transmission lines in connection with their distribution system.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for responding to, investigating, and correcting the cause of abnormal operations in accordance with § 192.605(c).

Wyckoff's O&M Plan, Section P-192.605(c), "Handling Abnormal Operations" contains references to hazardous liquid pipeline asset types such as pumps and product batches, even though Wyckoff operates a gas transmission pipeline. In addition, Section P-192.605(c) failed to include adequate guidance for checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation in accordance with § 192.605(c)(2).

Therefore, PHMSA proposes to require that Wyckoff revise its written procedures to include detailed procedures for safety when operating design limits have been exceeded, specifically addressing § 192.605(c) and (c)(2).

11. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to adequately include a procedure to review its O&M Plan at intervals not exceeding 15 months, but at least once each calendar year, in accordance with § 192.605(a).

Wyckoff's O&M Plan, Section P-192.605(a), "Operations & Maintenance," includes in relevant part:

"1. Have personnel who are knowledgeable in pipeline operations and maintenance review the Operations & Maintenance Manual. This review is accomplished through the following activities:
a. Reviewing the manual itself, including all procedures and forms used;
b. Reviewing other Wyckoff Gas Storage manuals referenced in this manual;"

Section P-192.605(a) failed to adequately define roles and responsibilities for the review process, such as which personnel are responsible for each section of the O&M Plan and other manuals. In addition, it failed to adequately define which manuals outside of the O&M Plan require an annual review, such as its Emergency Response Plan, OQ Plan, or CRM Plan.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to define roles and

responsibilities for the review process, such as which personnel are responsible for each section of the O&M Plan and other manuals, and define which manuals outside of the O&M Plan require an annual review.

12. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a)

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1)

(5) Starting up and shutting down any part of the pipeline in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for starting up and shutting down any part of the pipeline in a manner designed to assure operation within the maximum allowable operating pressure (MAOP) limits in accordance with § 192.605(b)(5).

Therefore, PHMSA proposes that Wyckoff revise its procedures to include adequate procedures for starting up and shutting down any part of the pipeline in a manner designed to assure operation within the maximum allowable operating pressure (MAOP) limits.

13. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a)

(c) Abnormal operation. For transmission lines, the manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded:

(1)

(4) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found, in accordance with § 192.605(c)(4).

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include adequate procedures for periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.

14. **§ 192.613 Continuing surveillance.**

(a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.

(b) If a segment of pipeline is determined to be in unsatisfactory condition but no immediate hazard exists, the operator shall initiate a program to recondition or phase out the segment involved, or, if the segment cannot be reconditioned or phased out, reduce the maximum allowable operating pressure in accordance with § 192.619 (a) and (b).

(c) Following an extreme weather event or natural disaster that has the likelihood of damage to pipeline facilities by the scouring or movement of the soil surrounding the pipeline or movement of the pipeline, such as a named tropical storm or hurricane; a flood that exceeds the river, shoreline, or creek high-water banks in the area of the pipeline; a landslide in the area of the pipeline; or an earthquake in the area of the pipeline, an operator must inspect all potentially affected onshore transmission pipeline facilities to detect conditions that could adversely affect the safe operation of that pipeline.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for continuing surveillance in accordance with each requirement of § 192.613.

Wyckoff's O&M Plan, Section P-192.613, "Continuing Surveillance" failed to address each of the requirements of § 192.613. First, Section P-192.613 failed to include adequate procedures to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions. Instead, it states only that responsibility for these determinations are distributed throughout the company.

Second, Section P-192.613 states in relevant part:

"If a segment of the pipe is determined to be in unsatisfactory condition, but without immediate hazards existing, the operator will develop and initiate a program to recondition or phase out the segment involved, or if this is not possible, reduce the maximum allowable operating pressure in accordance with 49 CFR 192.619(a) and (b)."

However, it fails to designate responsibility for remediation or identify a necessary repair, abandonment, or pressure reduction procedure.

Third, Section P-192.613 failed to provide for procedures for actions following an extreme weather event or natural disaster that has the likelihood of damage to pipeline facilities, in accordance with § 192.613(c).

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include adequate procedures for continuing surveillance in accordance with each requirement of § 192.613.

15. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a)

(d) Safety-related condition reports. The manual required by paragraph (a) of this section must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of § 191.23 of this subchapter.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of Section 191.23, in accordance with § 192.605(d).

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include adequate instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of Section 191.23.

16. § 192.614 Damage prevention program.

(a) Except as provided in paragraphs (d) and (e) of this section, each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities. For the purposes of this section, the term "excavation activities" includes excavation, blasting, boring, tunneling, backfilling, the removal of aboveground structures by either explosive or mechanical means, and other earthmoving operations.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for damage prevention in accordance with § 192.614(a).

Wyckoff's O&M Plan, Section P-192.614, "Damage Prevention Program," outlines the general requirements for a damage prevention program without providing adequate detail for roles and responsibilities of relevant personnel. In addition, Section P-192.614 fails to specify which one-call system it participates in, and fails to define responsibilities for how one-calls are received, what systems are checked, and which personnel are responsible for following up on one-calls.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include adequate procedures for damage prevention in accordance with § 192.614(a).

17. § 192.615 Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(1)

(3) Prompt and effective response to a notice of each type of emergency, including the following:

(i) Gas detected inside or near a building.

(ii) Fire located near or directly involving a pipeline facility.

(iii) Explosion occurring near or directly involving a pipeline facility.

(iv) Natural disaster.

Wyckoff's procedures for emergencies were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's *Emergency Response Plan* (Aug. 2022) ("Emergency Plan") failed to provide for prompt and effective response to each type of emergency in accordance with § 192.615(a)(3).

Wyckoff's Emergency Plan, Section A2, "Response Actions" fails to provide procedures for a prompt and effective response to gas detection inside or near a building.

Therefore, PHMSA proposes to require that Wyckoff revise its Emergency Plan to provide procedures for a prompt and effective response to gas detection inside or near a building.

18. § 192.617 Investigation of failures and incidents.

(a) Post-failure and incident procedures. Each operator must establish and follow procedures for investigating and analyzing failures and incidents as defined in § 191.3, including sending the failed pipe, component, or equipment for laboratory testing or examination, where appropriate, for the purpose of determining the causes and contributing factor(s) of the failure or incident and minimizing the possibility of a recurrence.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for investigation of failures and incidents in accordance with § 192.617(a).

Wyckoff's O&M Plan, Section P-192.617, "Investigating and Analyzing Incidents and Failures," fails to contain procedures for establishing a chain of custody for sending the failed pipe, component, or equipment for laboratory testing or examination, where appropriate, for the purpose of determining the causes and contributing factor(s) of the failure or incident and minimizing the possibility of a recurrence.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include procedures for establishing a chain of custody for sending the failed pipe, component, or equipment for laboratory testing or examination, where appropriate, for the purpose of determining the causes and contributing factor(s) of the failure or incident and minimizing the possibility of a recurrence.

19. § 192.619 Maximum allowable operating pressure: Steel or plastic pipelines.

(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure (MAOP) determined under paragraph (c), (d), or (e) of this section, or the lowest of the following:

(1) The design pressure of the weakest element in the segment, determined in accordance with subparts C and D of this part. However, for steel pipe in pipelines being converted under § 192.14 or uprated under subpart K of this part, if any variable necessary to determine the design pressure under the design formula (§ 192.105) is unknown, one of the following pressures is to be used as design pressure:

(i) Eighty percent of the first test pressure that produces yield under section N5 of Appendix N of ASME B31.8 (incorporated by reference, see § 192.7), reduced by the appropriate factor in paragraph (a)(2)(ii) of this section; or

(ii) If the pipe is 12 3/4 inches (324 mm) or less in outside diameter and is not tested to yield under this paragraph, 200 p.s.i. (1379 kPa).

(2) The pressure obtained by dividing the pressure to which the pipeline segment was tested after construction as follows:

(i) For plastic pipe in all locations, the test pressure is divided by a factor of 1.5.

(ii) For steel pipe operated at 100 psi (689 kPa) gage or more, the test pressure is divided by a factor determined in accordance with the Table 1 to paragraph (a)(2)(ii):

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for determination of maximum allowable operating pressure (MAOP) in accordance with § 192.619(a).

Wyckoff's O&M Plan, Section P-162.619, "MAOP Determination" identifies Form F-192.619 to calculate pipeline MAOP by segment. Section P-192.619 failed to specify where the records for material strength and pressure tests will be stored such that the calculation form values can be verified, and fails to provide for tying the segment forms into system wide MAOP. Form F-192.619 failed to include identifiers such as milepost or line number regarding the pipeline segment for which MAOP is being calculated, and failed to provide guidance on the appropriate factors to be used for class location.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include adequate procedures for determination of maximum allowable operating pressure (MAOP) in accordance with § 192.619(a).

20. § 192.631 Control room management.

(a)

(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary

for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(1)

(3) **Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months;**

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's *Control Room Management Plan* (Aug. 2024) ("CRM Plan") failed to include detailed procedures to test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months, in accordance with § 192.631(c)(3).

Wyckoff's CRM Plan, Section B, "Roles and Responsibilities" stated in relevant part:

"Upon discovery of loss of communications between SCADA and equipment, the controller will contact the supervisor, and then proceed with manual shut down of system. (Process found in CRM, section C). A reference to identify loss of communication can be found in Wyckoff's O&M 192.605 (c)."

Wyckoff's CRM Plan only provides for manual operation is a complete shutdown, and fails to include a testing procedure for this scenario.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include procedures to test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months, in accordance with § 192.631(c)(3).

21. § 192.706 Transmission lines: Leakage surveys.

Leakage surveys of a transmission line must be conducted at intervals not exceeding 15 months, but at least once each calendar year. However, in the case of a transmission line which transports gas in conformity with § 192.625 without an odor or odorant, leakage surveys using leak detector equipment must be conducted—

(a) In Class 3 locations, at intervals not exceeding 7 1/2 months, but at least twice each calendar year; and

(b) In Class 4 locations, at intervals not exceeding 4 1/2 months, but at least four times each calendar year.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for transmission leakage surveys in accordance with § 192.706.

Wyckoff's O&M Plan, Section P-192.706, "Leakage Surveys" requires Form F-192.706 to be filled out in the event a leak is discovered. However, during the inspection, Wyckoff failed to provide a copy of Form F-192.706. Wyckoff provided a different form, F-192.709, dealing with leak repairs

but Form F-192.709 does not provide the means to record the grading of the leak required by Section P-192.706. Without a proper form to grade any discovered leaks, Wyckoff's O&M plan is insufficient to ensure safe operation of its facilities.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to address transmission leakage surveys in accordance with § 192.706.

22. § 192.714 Transmission lines: Repair criteria for onshore transmission pipelines.

(a)

(d) Remediation of certain conditions. For onshore transmission pipelines not located in high consequence areas, an operator must remediate a listed condition according to the following criteria:

(1) Immediate repair conditions. An operator's evaluation and remediation schedule for immediate repair conditions must follow section 7 of ASME / ANSI B31.8S - 2004 (incorporated by reference, see § 192.7). An operator must repair the following conditions immediately upon discovery:

(i) Metal loss anomalies where a calculation of the remaining strength of the pipe at the location of the anomaly shows a predicted failure pressure, determined in accordance with § 192.712(b), of less than or equal to 1.1 times the MAOP.

(ii) A dent located between the 8 o'clock and 4 o'clock positions (upper 2/3 of the pipe) that has metal loss, cracking, or a stress riser, unless an engineering analysis performed in accordance with § 192.712(c) demonstrates critical strain levels are not exceeded.

(iii) Metal loss greater than 80 percent of nominal wall regardless of dimensions.

(iv) Metal loss preferentially affecting a detected longitudinal seam, if that seam was formed by direct current, low-frequency electric resistance welding, electric flash welding, or has a longitudinal joint factor less than 1.0, and the predicted failure pressure determined in accordance with § 192.712(d) is less than 1.25 times the MAOP.

(v) A crack or crack-like anomaly meeting any of the following criteria:

(A) Crack depth plus any metal loss is greater than 50 percent of pipe wall thickness; or

(B) Crack depth plus any metal loss is greater than the inspection tool's maximum measurable depth.

(vi) An indication or anomaly that, in the judgment of the person designated by the operator to evaluate the assessment results, requires immediate action.

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to address the remediation of certain pipeline conditions in accordance with the requirements of § 192.714(d)(1).

Wyckoff's O&M Plan, Section P-192.711, "Pipeline Repair Procedures," subsection "*Evaluation of Damage Extent and Schedule for Repair*" stated, in relevant part:

“2. Category 1 Condition (Immediate Condition):

- a. Metal loss greater than 80% of nominal wall;*
- b. Metal loss, which after an engineering evaluation, results in a predicted burst pressure less than maximum operating pressure at the location of the condition;*
- c. Any dent located on top of the pipeline (above the 4 & 8 o'clock position) with indication of metal loss, cracking, or stress riser;*
- d. Any dent located on top of the pipeline (above 4 & 8 o'clock position) with a depth greater than 6% of nominal diameter; and/or*
- e. Any condition discovered through an integrity assessment (ILI or hydro test as defined by CFR Part 192 Subpart O) that in the judgement of the Operations Storage Manager requires immediate action.”*

Section 192.714(d)(1)(i) requires in part that burst pressure less than 1.1 times maximum allowable operating pressure (MAOP) be used as the criteria for an immediate repair. In addition, the criteria for immediate repairs specific in sections 192.714(d)(1)(iv) and 192.714(d)(1)(v) were absent.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to address discovery of any condition that could adversely affect the safe operation of a pipeline segment not covered by an integrity management program in accordance with § 192.714(d)(1).

23. § 192.717 Transmission lines: Permanent field repair of leaks.

Each permanent field repair of a leak on a transmission line must be made by—

- (a)**
- (b) Repairing the leak by one of the following methods:**
 - (1)**
 - (2) If the leak is due to a corrosion pit, install a properly designed bolt-on-leak clamp.**

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for permanent field repair of leaks by using properly designed bolt-on-leak clamps in accordance with § 192.717(b)(2).

Wyckoff's O&M Plan, Section P-192.711, "Pipeline Repair Procedures," allows for the use of bolt-on-leak clamps to address leaks due to a corrosion pit, but fails to include procedures for the use of bolt-on-leak clamps.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include adequate procedures for permanent field repair of leaks by using properly designed bolt-on-leak clamps in accordance with § 192.717(b)(2).

24. § 192.739 Pressure limiting and regulating stations: Inspection and testing.

(a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at

intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is—

- (1) In good mechanical condition;**
- (2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;**
- (3) Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of § 192.201(a); and**
- (4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.**

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include adequate procedures for annual inspection, testing and capacity review of pressure regulating and relief devices in accordance with §§ 192.739 and 192.743.

Wyckoff's O&M Plan, Section P-192.731, "Inspection and Testing of Relief Devices and Remote-Control Shutdown Devices," failed to include fuel gas regulators or fuel gas relief devices as requiring inspection, testing, and capacity review. In addition, subsection "Verify Capacity of Relief Devices" only reiterates 49 CFR Part 192.743 and fails to include a procedure for determining sufficient capacity by calculation or test.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include adequate procedures for annual inspection, testing and capacity review of pressure regulating and relief devices in accordance with §§ 192.739 and 192.743.

25. § 192.745 Valve maintenance: Transmission lines.

- (a) Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.**

Wyckoff's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, Wyckoff's O&M Plan failed to include procedures for annual inspection of transmission line valves that might be required during any emergency in accordance with § 192.745(a).

Wyckoff's O&M Plan, Section P-192.745, "Valve Maintenance" failed to define which valves within its pipeline are subject to annual inspection.

Therefore, PHMSA proposes to require that Wyckoff revise its procedures to include procedures for annual inspection of transmission line valves that might be required during any emergency in accordance with § 192.745(a).

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 § 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 C.F.R. § 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 WGS maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2026-049-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings

cc: Aaron Daniels, EHS Manager, Wyckoff Gas Storage Company, LLC, aarond@kfoc.net
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