



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

901 Locust Street, Suite 480
Kansas City, MO 64106

WARNING LETTER

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 1-2026-050-WL

Dear Mr. Millican:

From April 8, 2025 through August 7, 2025, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA),¹ 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, it is alleged that WGS has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

1. § 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

¹ For this inspection, the representatives were inspectors for the New York Department of Public Service (NY DPS) acting as an interstate agent pursuant to 49 U.S.C. 60117(a)(2).

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 failed to evaluate and mitigate, as necessary, significant changes that pose a risk to safety or the environment through a management of change process in accordance with § 192.13(d). Specifically, Wyckoff failed to develop and follow a management of change process, as outlined in ASME B31.8S, section 11, and implement the process by February 26, 2024.

During the inspection, the NY DPS inspector requested records related to management of change for 2024. Wyckoff failed to provide any records and stated that it did not have a procedure or formal records for management of change.

Therefore, Wyckoff failed to evaluate and mitigate, as necessary, significant changes that pose a risk to safety or the environment through a management of change process in accordance with § 192.13(d).

2. § 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 failed 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). Specifically, Wyckoff failed to test and verify an internal communication plan for calendar years 2022, 2023, and 2024.

During the inspection, the NY DPS inspector requested records documenting testing and verification of its internal communication plan spanning the period 2022 through 2024. Wyckoff failed to provide any records and stated that testing and verification was not performed during this time period.

Therefore, Wyckoff failed 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).

3. § 192.736 Compressor stations: Gas detection.

(a)

(c) Each gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests.

Wyckoff failed to properly maintain and conduct performance tests on each of its gas detection and alarm systems in accordance with § 192.736(c). Specifically, Wyckoff failed to conduct performance tests on three gas detectors and failed to maintain adequate records of tests on six gas detectors for the period spanning calendar years 2022 through 2024.

During the inspection, the NY DPS inspector reviewed gas detection and alarm inspection records for the period spanning calendar years 2022 through 2024. These records did not include performance tests of three gas detectors (GDT-0500AA, GDT-0500AB, and GDT-0500CB). In addition, Wyckoff failed to provide records of performance tests of six gas detectors (GDT-0500AA, GDT-0500AB, GDT-0500BA, GDT-0500BB, GDT-0500CA, and GDT-0500CB).

Therefore, failed to properly maintain and conduct performance tests on each of its gas detection and alarm systems in accordance with § 192.736(c).

4. § 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—

Wyckoff failed to inspect and test pressure regulating equipment at intervals not exceeding 15 months, but at least once each calendar year in accordance with § 192.739(a). Specifically, Wyckoff failed to inspect four fuel gas line regulators located at Wyckoff Compressor Station between 2022 and 2024.

During the inspection, the NY DPS inspector reviewed inspection and test records for the time period spanning 2022 to 2024. Wyckoff failed to provide any records that four compressor fuel gas line regulators were inspected and tested. Wyckoff indicated that the regulators were not

inspected and tested, and stated that its understanding was that fuel gas regulators did not require inspection.

Therefore, Wyckoff failed to inspect and test pressure regulating equipment at intervals not exceeding 15 months, but at least once each calendar year in accordance with § 192.739(a).

5. § 192.743 Pressure limiting and regulating stations: Capacity of relief devices.

(a) Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in § 192.739(b), the capacity must be consistent with the pressure limits of § 192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations. . . .

(b)

(c) If a relief device is of insufficient capacity, a new or additional device must be installed to provide the capacity required by paragraph (a) of this section.

Wyckoff failed to install a new or additional pressure relief device to provide the capacity required by section 192.743(a) when a relief device was at insufficient capacity in accordance with § 192.743(c). Specifically, Wyckoff failed to install a new or additional device to provide adequate capacity, or adjustments made to limit the required capacity, regarding two relief devices that were of insufficient capacity.

During the inspection, the NY DPS inspector reviewed PSV verifications records for the time period spanning calendar years 2022 to 2025. Those records indicated that two relief devices (PSV-1308 and PSV-1304) were of insufficient capacity. However, Wyckoff failed to install a new or additional device to provide adequate capacity, or adjust to limit the required capacity.

Therefore, Wyckoff failed to install a new or additional pressure relief device to provide the capacity required by section 192.743(a) when a relief device was at insufficient capacity in accordance with § 192.743(c).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are 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 violation 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 violation 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 violation 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 violation 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 violation 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 violation 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 you to correct the items identified in this letter. Failure to do so will result in WGS being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2026-050-WL**. 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).

Sincerely,

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

cc: Aaron Daniels, EHS Manager, WGS, aarond@kfoc.net
Andrew Hutton, SR. HGS Representative, WGS, huttona@kfoc.net