



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

8701 S. Gessner, Suite 630
Houston TX 77074

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: Tina_faraca@tcenergy.com

August 26, 2024

Tina Faraca
Executive Vice President & President
Columbia Gas Transmission LLC
700 Louisiana Street, Suite 700
Houston, Texas 77002

CPF 4-2024-028-NOA

Dear Ms. Faraca:

From March 11 through March 15, 2024, of the on-site inspection, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Columbia Gas Transmission LLC's (Columbia Gas) procedures for operations and maintenance in Chesapeake, Virginia.

As a result of the inspection, PHMSA has identified an apparent inadequacy found within Columbia Gas's plans or procedures. The item inspected and the inadequacy is described below:

- 1. § 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.

Columbia Gas's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 191.5(a). Specifically, Columbia Gas's *LNG Operations and Maintenance (O&M): 191.05 Immediate Notice of Certain Incidents (US) (Rev. 4; 12/1/23)*, section 4.0, failed to specify that certain incidents must be immediately reported, no later than one hour after confirmed discovery, in accordance with § 191.5(a). Columbia Gas must revise its procedure to clarify that certain incidents must be immediately reported no later than one hour after confirmed discovery in accordance with § 191.5(a).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 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 Columbia Gas maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Bryan Lethcoe, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2024-028-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Bryan Lethcoe
Director, Southwest Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings

cc: Dan Cerkoney, Sr. Manager, Regulatory Compliance, dan_cerkoney@tcenergy.com