



WBI ENERGY, INC.
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January 7th, 2026

Mr. Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 340
Lakewood, CO 80228

RE: Response to Notice of Probable Violation and Proposed Compliance Order (CPF 5-2025-039-NOPV)

Dear Mr. Hubbard,

On December 8th, 2025, WBI Energy Transmission Inc. (WBI), received Notice of Probable Violation and Proposed Compliance Order (NOPV) CPF 5-2025-039-NOPV. As provided in section I of *Response Options for Pipeline Operators & Excavators in Enforcement Proceedings* and in 49 CFR 190.208, WBI must submit its response to the NOPV within 30 days of receiving the NOPV, which in this case is January 7th, 2026.

Under Item #1 on pages 1 and 2 of the NOPV, PHMSA suggests that WBI committed a probable violation of 49 CFR 192.631, stating that “Specifically, WBI failed to develop and implement a procedure to monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not to exceed 15 months, that would assure controllers have sufficient time to analyze and react to incoming alarms, as required by § 192.631(e)(5).”

Further, PHMSA states that WBI’s Gas Control Manual, Section 2: Alarm Management Plan (AMP) dated December 12, 2023, and an updated version of the AMP dated November 25, 2024, were each reviewed and both were found by PHMSA to be lacking a procedure for conducting a Workload Assessment.

PHMSA is correct in stating that WBI’s Gas Control Manual, Section 2: Alarm Management Plan, lacks a procedure to conduct a Workload Assessment. However, WBI’s Gas Control Manual Section 1: Control Room Management, contains a procedure (specifically in Section 1.7, or on page 22) for conducting a Workload Assessment as required by 192.631(e)(5). WBI provided PHMSA the December 12, 2023 revision of the Control Room Management procedure containing the Workload Assessment procedure on May 1st, 2024. Following recommendations made by PHMSA during the Control Room Management inspection in June and July of 2024, WBI revised the Workload Assessment procedure within the Control Room Management procedure as well as incorporated by reference into the Workload



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Assessment procedure a Controller Activity Survey spreadsheet, which is reflected in the November 25, 2024 revision of the Control Room Management procedure. The revised Control Room Management Manual and related Controller Activity Survey spreadsheet were provided to PHMSA on November 27th, 2024.

WBI believes that PHMSA is incorrect in stating that WBI failed to develop and implement a procedure required by paragraph (e) of 49 CFR 192.631 as required by 192.631(a)(2). Therefore, WBI is responding to this NOPV in accordance with 49 CFR 190.208(b)(3), contesting in writing the allegation under Item #1 of CPF-5-2025-039-NOPV, without requesting a hearing. WBI Energy respectfully requests that PHMSA review WBI's procedure for conducting a Workload Assessment found in the December 12, 2023, and November 25, 2024 revisions of WBI's Gas Control Manual, Section 1: Control Room Management. These documents and the related Controller Activity Survey spreadsheet are attached to this letter for convenience.

Please do not hesitate to contact a member of our compliance team if you have any questions.

Respectfully submitted,

Rob Johnson
President
WBI Energy Transmission, Inc.

Submitted via e-mail.

Attachments:

- *WBI Energy Gas Control Manual Section 1 (Control Room Management) - revision November 25th, 2024*
- *WBI Energy Gas Control Manual Section 1 (Control Room Management) - revision December 12th, 2023*
- *Controller Activity Survey spreadsheet - revision November 25th, 2024*