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STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
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TO: ANR Pipeline Company - Eaton Rapids Gas Storage

FROM: David J. Chislea, Director  
Gas Safety & Operations Division

DATE: January 19, 2024

SUBJECT: 2024 Underground Natural Gas Storage Inspections and Program Updates

As an operator of an intrastate underground natural gas storage (UNGS) facility in Michigan, you are receiving this letter on behalf of the Michigan Public Service Commission (MPSC) under direction of the Pipeline and Hazardous Materials Safety Administration's (PHMSA) UNGS State Program. The MPSC and the Michigan Department of Environment, Great Lakes, and Energy's (EGLE) Oil, Gas, and Minerals Division (OGMD) conduct joint inspections to ensure safe operations of facilities and to enforce pipeline safety regulations in accordance with 49 CFR Part 192 for UNGS facilities.

This letter is written to convey important information regarding the UNGS program, including its requirements for inspections and report filing. In addition, incident information and relevant regulatory requirements pursuant to the Administrative Rules of Part 615, Supervisor of Wells, of the Natural Resources and Environmental Protection Act (NREPA) are provided below. An updated MPSC/EGLE Staff contact list is enclosed for your convenience.

### **2024 Planned UNGS Inspections**

The MPSC/EGLE will conduct inspections throughout 2024 to continue to ensure safe operations of UNGS facilities and to enforce pipeline safety regulations in 49 CFR Part 192 for underground natural gas storage facilities. The following are the types of inspections that are conducted along with a brief description of each inspection type:

1. **Standard Inspections**: Standard inspections include an evaluation of the UNGS Program and Records for each storage field and onsite inspections of select wellheads/well sites at the associated field. Currently, Standard inspections are conducted on a four-year cycle for each UNGS field and Storage Integrity Management Program (SIMP). Operators are expected to reserve a full week to accommodate these inspections. The Standard inspection may be conducted in-person at the operator's locality, virtually, or a combination thereof.

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## Data/Report Submittals

### Submission Addresses

The Michigan Gas Safety Standards (MGSS) require that any report filed with PHMSA must be concurrently filed with the MPSC. Per R 460.20504 Reports, the MPSC/EGLE Staff requires paperless submission of all correspondence to our e-mail address: [LARA-MPSC-Operations@michigan.gov](mailto:LARA-MPSC-Operations@michigan.gov). If responding to an existing case, please use the same email address ([LARA-MPSC-Operations@michigan.gov](mailto:LARA-MPSC-Operations@michigan.gov)) and include the case reference number (ref: xxxxxxx:ref) in the email so that your response will be directed to the appropriate case. As noted below, additional reports specific to wellbores are required to be filed pursuant to the Administrative Rules of Part 615, Supervisor of Wells, EGLE OGMD. If you have questions regarding report filing, please contact Mr. Kevin Spence (MPSC) by email at [spencek@michigan.gov](mailto:spencek@michigan.gov) or by phone at 517-643-7795 or Mr. Jason Mailloux (EGLE) by email at [maillouxj@michigan.gov](mailto:maillouxj@michigan.gov) or by phone at 517-245-2195.

The MPSC offices are located at the following address:

Michigan Public Service Commission  
7109 West Saginaw Hwy  
Lansing, MI 48917

The EGLE offices are located at the following address:

Michigan Department of Environment, Great Lakes, and Energy  
525 W Allegan St.  
Lansing, MI 48933

### Annual Reports

The annual reports for UNGS operators can be found on PHMSA's website at: <https://www.phmsa.dot.gov/forms/operator-reports-submitted-phmsa-forms-and-instructions>.

The calendar year 2023 annual reports for all regulated operators are due by March 15, 2024. These forms should be electronically submitted to PHMSA at: <http://portal.phmsa.dot.gov/>.

When initially submitting your annual reports for calendar year 2023, please provide them electronically to [LARA-MPSC-Operations@michigan.gov](mailto:LARA-MPSC-Operations@michigan.gov). The MPSC/EGLE Staff would like a new case created for each operators' calendar year 2023 reports, so for the initial submission, please send a new email using [LARA-MPSC-Operations@michigan.gov](mailto:LARA-MPSC-Operations@michigan.gov) without any reference numbers or responding to any previous emails (no further action is required if UNGS annual reports are provided along with the other annual reports referenced in the 2024 Gas Safety Pipeline Inspections and Program Updates letter). Supplemental or corrected filings should be submitted using the reference number generated from the initial submittal so the information is directed into the appropriate case.



As of the date of this annual letter, for any well located within an UNGS storage facility that has an existing bridge plug or other isolation device remaining set within the wellbore, the operator shall submit a RCOWS within 90 days of the date of this annual letter. The RCOWS shall include the date, depth, and purpose for setting the bridge plug or other isolation device.

For any well not utilized for its intended purpose for greater than 12 consecutive months, the operator shall submit an ACOWS requesting temporary abandonment status. A RCOWS is not required to be submitted for temporary abandonment status.

UNGS operators are required to submit Form EQP 7141, Gas Storage Operations Annual Well Fee Assessment Report, on an annual basis by January 31 of each year. This Form requires reporting of each well status during the year.

Electric and Radiation Logs run on UNGS wells are to be submitted within 30 days of the logging run.

The logs shall be submitted as digital copies by email to [EGLE-GeologicalRecords@Michigan.gov](mailto:EGLE-GeologicalRecords@Michigan.gov); if size limitations prohibit submission by email (generally if cumulative file size is greater than 20 MB), digital copies shall be submitted by mail on a USB flash drive or CDR/DVDR to the following address:

Oil, Gas, and Minerals Division  
P.O. Box 30256  
Lansing, MI 48909-7756

All log files shall be submitted in Log ASCII Standard (LAS) and Tag Image File (TIF) format. PDF files and paper copies may be accepted with prior approval by EGLE OGMD. Files shall be named using the well permit number, well name, and log type. All files are to be submitted as single page TIF and/or single page PDF.

The reports indicated above are required to be exclusively sent to: [EGLE-GeologicalRecords@michigan.gov](mailto:EGLE-GeologicalRecords@michigan.gov). Instructions for filing requirements and the applicable Forms are available from EGLE's website: <https://www.michigan.gov/egle/about/organization/oil-gas-and-minerals/oil-and-gas/oil-and-gas-forms>. If you have questions regarding report filing, please contact Mr. Jason Mailloux (EGLE) by email at [maillouxj@michigan.gov](mailto:maillouxj@michigan.gov) or by phone at 517-245-2195.

### **Attachments**

An updated MPSC/EGLE UNGS Staff Contact List dated February 14, 2023. Please exclusively use the incident notification phone number (517-284-8230) for reporting incidents.

This information has been provided to facilitate inspections. If you have any questions regarding this letter, please contact Mr. Jason Mailloux ([maillouxj@michigan.gov](mailto:maillouxj@michigan.gov)) or Mr. Kevin Spence ([spencek@michigan.gov](mailto:spencek@michigan.gov)).

Enclosures:

Contact list for MPSC/EGLE Staff

cc: MPSC/EGLE UNGS team



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