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September 11, 2020

**VIA ELECTRONIC MAIL**

Mark Marini, Secretary  
Department of Public Utilities  
One South Station, 5<sup>th</sup> Floor  
Boston, MA 02110

Re: Bay State Gas Company d/b/a Columbia Gas of Massachusetts – D.P.U. 19-140  
Compliance Agreement Consent Order Requirements (15) and (22)

Dear Mr. Marini:

Pursuant to the Consent Order, and associated Compliance Agreement, dated August 14, 2020, between the Pipeline Safety Division (the “Division”) of the Massachusetts Department of Public Utilities and Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“CMA”) or the “Company”) in the above-captioned matter, the Company hereby provides the following responses to address the requirements of Items 15 and 22 of the Consent Order. Also enclosed is the Company’s Statement in Support of a Finding of Critical Energy Infrastructure Information.

**Compliance Agreement Requirement (15)**

Within 30 days of the effective date of this Order, CMA shall provide an incident report highlighting and addressing key failures with the April 16, 2019 Palmer Overpressurization and the March 31, 2020 Chicopee Outage.

**Response:**

Please see Attachment 19-140-15(a) for the Incident Report for the Palmer Overpressurization, and Attachment 19-140-15(b) CONFIDENTIAL for the Incident Report for the Chicopee Outage.

In the case of the April 16, 2019 Palmer Overpressurization, an Incident Review form was utilized to conduct the incident review. In the case of the March 31, 2020 Chicopee Outage, an Apparent Cause Analysis Cause Map format was utilized to conduct the incident review. Either form, or both forms, may be used in order to conduct reviews of specific unplanned events consistent with the requirements of 192.617 – Investigation of Failures. While the documents vary in format, both documents include a summary of events, key data and facts, an analysis of causal factors, and recommendations to prevent similar events from occurring in the future.

Compliance Agreement Requirement (22)

Within 30 days of the effective date of this Order, CMA shall provide the Department with evidence that the support systems, protective enclosure washout, plant perimeter lighting, and emergency shut down violations in all LNG facilities have all been remedied as stated in the Company’s February 27, 2020 response.

Response:

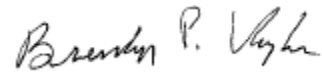
Please refer to Attachments 19-140-22(a) through (h) for documentation evidence that the above issues have been remedied. These attachments are summarized and described in the table below:

<b>Issue Source</b>	<b>Issue</b>	<b>Attachment</b>	<b>Description</b>
Marshfield Exit Letter / NOPV	LNG Pipe Support	Attachment DPU 19-140-22(a)	Photo of Marshfield LNG Pipe Support Repair; Pipe Support Repair Invoice
Marshfield Exit Letter/ NOPV	Protective Enclosure Washout	Attachment DPU 19-140-22(b)	Photo of Marshfield LNG remedied protective enclosure washout
Marshfield Exit Letter / NOPV	Plant Perimeter Lighting	Attachment DPU 19-140-22(c)	Invoice for Marshfield LNG 4 LED light work
Marshfield Exit Letter	Marshfield Emergency Exits	Attachment DPU 19-140-22(d)	Photos of installed crash gates (2) at Marshfield
Marshfield Exit Letter / NOPV	Emergency Shut Down Device violation – desk and button labels	Attachment DPU 19-140-22(e) CONFIDENTIAL	Marshfield: Photos of desk returned to normal location (out of the way of the Emergency Shut Down (ESD) device; photo of ESD device buttons; photo of map showing ESD device location
Easton Exit Letter	Emergency Shut Down Device violation	Attachment DPU 19-140-22(f) CONFIDENTIAL	Easton: Photos of ESD buttons; photo of map showing ESD locations
Easton NOPV	Update facility map to no longer consider the eastern gate an “exit”, or replace the gate with a “crash gate”	Attachment DPU 19-140-22(g) CONFIDENTIAL	Easton: Photo of eastern gate with “exit” sign removed, photo of updated facility map which no longer shows the eastern gate as an “exit”
Lawrence Warning Letter	Correct the opening at the gate at back of plant	Attachment DPU 19-140-22(h)	Photo of corrected opening at the gate at back of Lawrence LNG plant. Issue corrected by installing chain link fence in place of gate.

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Thank you very much for your attention to this matter. Please contact me with any questions.

Very truly yours,

A handwritten signature in black ink that reads "Brendan P. Vaughan". The signature is written in a cursive style.

Brendan P. Vaughan

Enclosures

Cc: Laurie E. Weisman, Esq. – Hearing Officer  
Service List, D.P.U. 19-140