

Underground Natural Gas Storage Program Common Operator Issues

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UNGS Team
USDOT / PHMSA



Common Operator Issues

- Third Party Well Data
 - Best Practices: Utilize State O&G Database
- Lack of field data or incomplete review of data from prior owner



Common Operator Issues

- Parroting code word for word without site specific information/procedures for that well or field (i.e. insert company name here)



Common Operator Issues

- No effectiveness reviews
- Construction Notifications:
 - Late or not submitted.
- No threat/hazard interactions



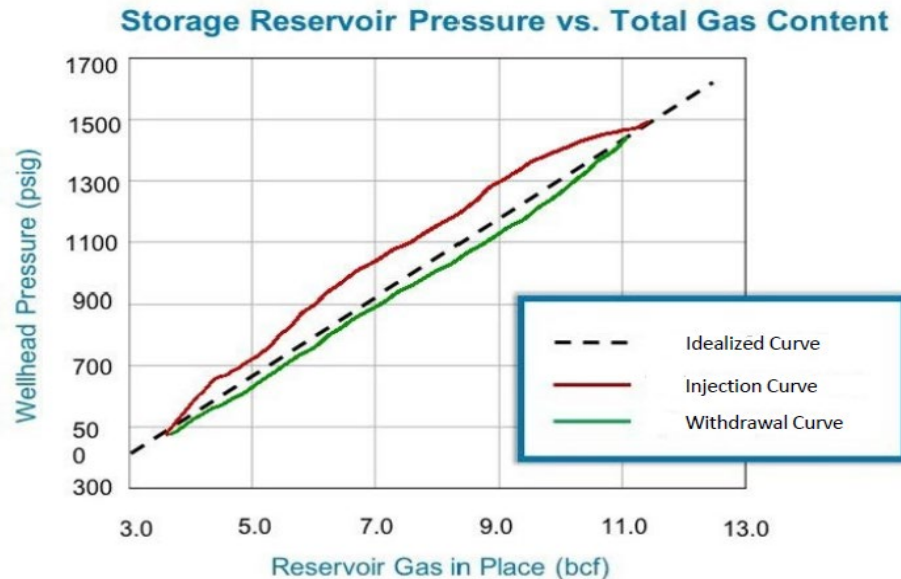
Common Operator Issues

- Lack of detailed knowledge on:
 - geological characteristics/events
 - Well Control/Blow-out Contingency Plan & specific operator requirements/procedures



Common Operator Issues

- **Inventory Verification**
 - Hysteresis Curves & Inventory/PSIA Curves
 - Metering errors



Common Operator Issues

- Valve inspections & isolation



Common Operator Issues

- Inadequate procedures
- Failure to follow procedures
- Inadequate training
- Workforce Retirements – Losing experience



Common Operator Issues

- **Emergency Response Plan**
 - Does not account for all required events
 1. Accidental Release
 2. Natural Disaster
 3. Equipment Failure
 4. Third Party Damage



Common Operator Issues

- **Training**
 - Emergency response plan
 - Records
 - Retention
- **O&M procedures – training**



ANY QUESTIONS

