



**VIA ELECTRONIC TRANSMISSION**

October 18, 2012

Mr. David Barrett  
Director, Central Region Office of Pipeline Safety  
901 Locust Street, Room 462E  
Kansas City MO 64106

Re: CPF 3-2012-5022W Enbridge Line 6B Pipe Replacement Project

Dear Mr. Barrett:

The information contained herein is in response to the Warning Letter and accompanying Request For Information (RFI) from The Pipeline and Hazardous Materials Safety Administration (PHMSA) received October 8, 2012. Enbridge submits the following written explanations, information and other materials in response to the Warning Letter and RFI, as requested.

In accordance with §195.202, Enbridge has developed detailed written construction specifications consistent with the requirements of Part 195, which serve as the basis for the Company's requirements when performing contracted pipeline system construction.

Enbridge contracted with Precision Pipeline LLC (Precision) to construct the Line 6B Replacement Project, and they are required to complete the work in accordance with Company specifications. However, Enbridge also understands its obligations under §195.204 to ensure trained and qualified inspectors are in place to effectively monitor that the Contractor is meeting those obligations and that construction specifications are understood and followed. The Company relies on independent third-party inspectors in alliance with Enbridge Construction Management personnel to ensure the installation of the pipeline is planned and constructed in accordance with required regulations and company specifications.

Items identified in the Warning Letter and RFI have been investigated further amongst the above referenced parties and Enbridge Project personnel, and accordingly, Enbridge submits the following in response to each item, as requested within the RFI.

**RFI #1**

*Processes, training, verification and documentation describing how Enbridge will prevent recurrence of failures to follow the specifications and/or procedures for holiday detection on the remainder of the project.*

**Enbridge Response**

During a construction inspection performed by PHMSA on October 2-4, 2012 it was noted by the PHMSA inspector that Precision personnel were performing holiday detection activities with tape and other debris adhered to the outer surface of the pipe coating. This is not in

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accordance with Enbridge's Holiday Detection Procedures and NACE standards and recommended practices referenced therein.

Immediately after being notified, Enbridge Project Management issued a directive via email to Enbridge Construction Management and Precision Pipeline requiring that individuals involved in holiday detection receive remedial training and that the issue be addressed in the next day's inspector meeting/contractor foreman meeting and at every crew's tailgate meeting (see Exhibit 'A'). The directive also required Precision Pipeline to develop an action plan to prevent any reoccurrences. Further, this issue will be a recurring topic at all daily Enbridge inspector meetings and Enbridge/Precision management meetings until the end of the project.

In response to the Enbridge directive Precision Pipeline developed and implemented a Pre-jeeping Action Plan which requires that both a Precision inspector and an Enbridge inspector perform a visual check of the pipe, by section, prior to jeeping (see Exhibit 'B'). Both inspectors are then required to sign off on the Pre-Jeep Inspection Log indicating that the procedure has been followed and that all tape and foreign material has been removed (see Exhibit 'C'). In addition, a note has been added to the Enbridge Coating Daily Inspection Report for the Enbridge inspector to affirm that the pipe has been visually inspected for foreign material prior to jeeping (see Exhibit 'D').

### **RFI #2**

*Processes and documentation describing how Enbridge will evaluate Line 6B replacement pipe to ensure coating integrity where ineffective holiday detection may have occurred during construction. For example, will Enbridge be performing over-the-line surveys such as DCVG or ACVG after backfill? Please also describe when and how cathodic protection will be applied to the Line 6B replacement pipe.*

### **Enbridge Response**

A DCVG or ACVG survey will be performed post completion and prior to Precision Pipeline demobilization to ensure coating integrity for all Line 6B replacement sections. Precision Pipeline will be responsible for all digs and subsequent repairs if needed.

The cathodic protection system for the replacement sections of Line 6B will be constructed concurrently with the mainline construction to the extent possible and energized as soon as practicable upon completion. This will include immediate connection to existing rectifiers for Line 6B and Vector pipelines which run parallel in the right-of-way. PHMSA inspector Hans Shieh has previously met with Enbridge's Cathodic Specialist responsible for that section of the pipeline and reviewed the design and installation procedures, as well as, plans for bonding existing and foreign pipelines and found them to be acceptable. Please let me know if you require any further review and/or information submittal in relation to the cathodic protection system.

**RFI #3**

*Processes, training, and documentation describing how Enbridge will prevent recurrence of inspectors not properly ensuring that the pipeline is constructed according to the holiday detection specifications and/or procedures on the remainder of the project.*

**Enbridge Response**

This information is included in response to RFI #1.

**RFI #4**

*Processes, training, verification, and documentation describing how Enbridge will prevent recurrence of welder's qualification and records not being in accordance with the welding procedures on the remainder of the project.*

**Enbridge Response**

The welder qualification paperwork referenced in the Warning Letter had yet to be proofed with the welding inspector's field notes at the time of the PHMSA inspection. The welding inspector's field notes (see Exhibit 'E') clearly indicate that the pipe was heated to 300 degrees F at 11:30 am, 310 degrees F at 3:30 pm and 300 degrees F on the first and second weld passes. The welder qualification with the correct temperatures has been completed and placed in the permanent welder qualification files. Going forward, Enbridge will require an NDT auditor to QA/QC all welder testing paperwork prior to the documentation being assembled and placed in the permanent welder qualification files.

**Additional Information**

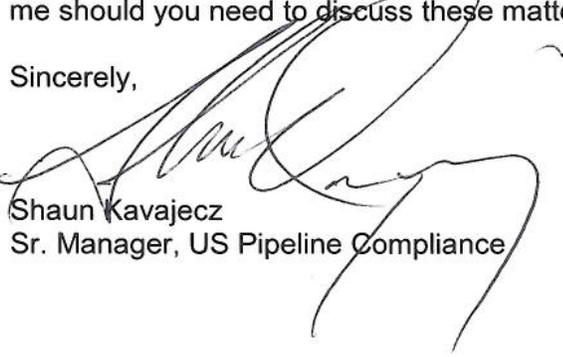
Subsequent to the inspection noted above, an additional issue was identified for which we would like to provide a response and update on actions taken. On October 11, 2012 Gery Bauman of PHMSA along with Enbridge Compliance personnel identified five girth welds where the two part epoxy coating appeared to have been exposed to moisture during the application process. The issue was addressed with the Precision foreman on site who indicated at that time he would identify the crew(s) responsible and see that they would receive additional training. He also indicated that the five welds would be stripped and recoated.

As of the date of this letter it has been verified that the responsible crew has received additional training on the application of two part epoxy coating specifically related to acceptable atmospheric conditions during the coating process (see Exhibit 'F'). In addition, the five welds in question were stripped to bare metal and recoated. Enbridge Coating Inspectors were notified of the situation in the inspector meeting and are relaying the message to all coating crews reiterating that the pipe surface must be clean and dry and weather conditions must be acceptable to facilitate the application of coating. Further, the Enbridge Inspectors will be placing their initials next to any 2 part applications signifying that the correct procedure was followed. It was reinforced to the contractor that there would be no coating performed unless an Enbridge Inspector was present.

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I trust this satisfies all information required as outlined in your RFI. Please feel free to contact me should you need to discuss these matters further or need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shaun Kavajecz', written over a large, faint circular watermark or background mark.

Shaun Kavajecz  
Sr. Manager, US Pipeline Compliance

# Exhibit A

## Project Management Directive

## David Stafford

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**From:** [REDACTED]  
**Sent:** Wednesday, October 03, 2012 3:07 PM  
**To:** [REDACTED]  
**Subject:** PHMSA and tape on the pipe  
**Importance:** High

I believe this is at Pratt Road: PHMSA noticed black tape on the pipe during lowering-in. The guys removed the tape and then jeepeed. PHMSA then walked down the ditch and noticed another, or more than one spot, with black tape (believe near a weld).

Now a bell hole has to be dug, the tape removed and the pipe jeepeed – more lost time / more wasted money.

1. I want some type of additional remedial training for **EVERYONE** – contractor and company - responsible for removing or who are responsible for insuring that someone removes the tape – **immediately**.
2. I want the issue covered in tomorrow's inspector meeting / contractor foreman meeting / and at every tailgate meeting on the entire spread.
3. I also want an action plan of how this is not going to happen again.

Regards,

[REDACTED]  
Manager Engineering and Construction  
Enbridge Energy, Major Projects US  
[REDACTED]

# Exhibit B

## PPI Action Plan – Pre-Jeeping Assessment

## PRECISION PIPELINE LLC. ACTION PLAN

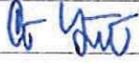
<b>ISSUE:</b> TAPE/DEBRIS ON PIPE WHEN JEEPING	<b>PLAN:</b> Take steps to eliminate all debris on pipe prior to jeeping. 100 % compliance	<b>Date:</b> 10-6-2012
	<b>WHO WILL DIRECT &amp; MONITOR:</b> Precision Pipeline LLC QA/QC Dept.	<b>Specific Contact:</b> Chris Lillie clillie@precisionpipelinellc.com
<b>AFFECTED EMPLOYEES:</b> Designated Lowering in, coating, jeeping & QA/QC employees		
<b>Specific Areas to Improve:</b> All debris (Specifically tape) is to be removed prior to jeeping of pipe.		
<b>Problems to Overcome:</b> (Briefly describe possible barriers that could affect 100% compliance) – Complacency or lack of communication.		

Detailed Specific Actions in Sequence (Include regular progress reviews with the support team as a part of the specific actions.)	Responsible person(s)	Resources	Date/Time*	Actions To Look For
<b>Step 1. Affected crews will be educated on additional procedures to be used prior to jeeping taking place. (Precision Pipeline on site management, Lowering in, Coating crews &amp; QA/QC)</b>	Chris Lillie/ Reina Anderson		10-6-2012	Designated employees will be responsible for any additional actions needed
<b>Step 2. Additional tools will be added to pre- jeeping &amp; jeeping crews to assist in debris removal</b>	QA/QC Personnel	Telescopic mirrors Rags, wire brushes Ect.	10-6-2012	More effective visual inspection
<b>Step 3. An additional Audit form will be used by the QA/QC Dept &amp; all designated employees to ensure compliance</b>	QA/QC Personnel Designated crew employees	See attached form To be used daily.	10-6-2012	Documentation of Compliance available for review.
<b>Step 4. Form must be signed by onsite inspector</b>	Designated site inspector	See attached Log	10-6-2012	Additional reinforcement that proper steps are in place and followed.
<b>Step 5. Weekly review of action plan &amp; inspection logs with support team. Make additional steps if needed</b>	Chris Lillie Joey Wade Brent Sherburne Enbridge designates		Each Friday	Daily & weekly review for compliance & possible additions/revisions to plan
<b>Step 6. Review any items from step 5 with any affected crews.</b>	Chris Lille or a member of the QA/QC team		Each Saturday	Communicate all positive results & and ensure the crews understand any deficient areas and the corrections needed.
<b>Step 7. Review results will be addressed with the spread employees at the weekly safety meeting</b>	Chris Lille or a member of the QA/QC team		Each Tuesday	Communicate all positive results & be open to employee suggestions. Review any deficient areas.

Step 8.				
Step 9.				
Step 10.				
Step 11.				

**Commitment of Support Team:**

Precision Pipeline LLC is committed to these initial steps to eliminate all debris on pipe & encourage pipe quality prior to jacking pipe. This plan will be reviewed weekly with the on-site support team. Results of the review & any plan improvements will be relayed to all employees as well Enbridge management.

Signature of Project Manager: 	Date: 10-6-12
Signature of Superintendent: 	Signature of QA/QC Lead: 
Signatures of designated employees:	

# Exhibit C

## Pre-Jeep Inspection Log



# Exhibit D

## 211A Coating Daily Report



# Exhibit E

## Welding Field Notes

SET IN WARE @ 4:30  
WE MOVED @ 5:00 TIC  
7:00  
MOVED TO BYRON RD

PLACES IN PLACE  
AND ESCORTS FOR  
THE LOWBOYS 1944

9-27-12

END FACE @ BYRON RD.  
START @ 10741 + 50 } 3850  
END @ 10703 + 00 }  
WORKING ON MACHINE GET  
STARTED CUTTING @ 10:30  
CUT TIL

MR. 668.9  
MP. 668.2  
250-400

9-28 TEST DENNIS SAWYER  
BUT WELD WP-140  
DIT. OK WELDED PASS

9-28-12  
TEST WELDERS  
WP-140 WP-144  
9-29-12  
TEST WELDER

THRU WALL WP-144  
HEAT 6. ARDUNA  
REPAIR AREA

9-29-12  
TEST WELDER  
DENNIS SAWYER  
BRANEN WELD WP 103 REV 1  
STRAPS CLEAR & CLEAN

9-29 Tack up  
START FINISH TEE  
11:30 HEAT TO 300  
END 1 BEAD OK GRIND  
3:30 HEAT TO 310°  
4 min OK remaining PASSES  
15 min HEAT OK min 300°  
STOP LET TEE COOL TO  
30 min AMBIENT TEMPER.

# Exhibit F

## Coating Retraining Certs



THIS IS TO CERTIFY THAT

NATHAN SUMMERS

has attended a demonstration of the correct Field Application Procedures of Denso's Protal Liquid Coatings and is hereby certified to apply these products.

[Signature]  
Representative

10/16/2012  
Date Issued



THIS IS TO CERTIFY THAT

ROY BYER

has attended a demonstration of the correct Field Application Procedures of Denso's Protal Liquid Coatings and is hereby certified to apply these products.

[Signature]  
Representative

10/16/2012  
Date Issued



THIS IS TO CERTIFY THAT

G WENDOLYN SMITH

has attended a demonstration of the correct Field Application Procedures of Denso's Protal Liquid Coatings and is hereby certified to apply these products.

[Signature]  
Representative

10/16/2012  
Date Issued



THIS IS TO CERTIFY THAT

GERALD MEADOWS

has attended a demonstration of the correct Field Application Procedures of Denso's Protal Liquid Coatings and is hereby certified to apply these products.

[Signature]  
Representative

10/16/2012  
Date Issued