

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 23, 2015

Mr. Pete Kirsch
Vice President Operations and Engineering
Enable Gas Transmission, LLC
1111 Louisiana Street
Houston, TX 77002

CPF 4-2015-50004W

Dear Mr. Kirsch:

On multiple occasions between Dec. 15, 2014 and Feb. 6, 2015, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code were onsite and inspected your Enable Gas Transmission LLC (Enable, the Operator) pipeline construction project in Arkansas. This construction project is still ongoing.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation(s) are:

- 1. §195.230 Welds: Repair or removal of defects**
 - (a) Each weld that is unacceptable under §195.228 must be removed or repaired. Except for welds on an offshore pipeline being installed from a pipe lay vessel, a weld must be removed if it has a crack that is more than 8 percent of the weld length.**
 - (b) Each weld that is repaired must have the defect removed down to sound metal and the segment to be repaired must be preheated if conditions exist which would**

adversely affect the quality of the weld repair. After repair, the segment of the weld that was repaired must be inspected to ensure its acceptability.

- (b) Repair of a crack, or of any defect in a previously repaired area must be in accordance with written weld repair procedures that have been qualified under §195.214. Repair procedures must provide that the minimum mechanical properties specified for the welding procedure used to make the original weld are met upon completion of the final weld repair.**

Enable failed to repair a branch weld made on the BT-39 12-inch pipeline construction near Little Rock, AR that should not have passed visual examination. A visual examination would show that this weld had poor fit-up, excessive weld reinforcement and weld passes were not made according to the qualified welding procedure.

2. §195.561 When must I inspect pipe coating used for external corrosion control?

- (a) You must inspect all external pipe coating required by Sec. 195.557 just prior to lowering the pipe into the ditch or submerging the pipe.**

- (b) You must repair any coating damage discovered.**

Enable failed to completely repair, by removal and re-application, coating damaged by pre-heating the pipe in preparation for application of the field joint coating. Enable did not completely remove the factory applied FBE coating adjacent to the cutback that was damaged when inductively heating the pipe. The pipe was being heated inductively in preparation for the application of the 3M Skotchkote 6233 FBE coating being used to coat the field joints. The application procedures for this coating require that the pipe be pre-heated to a temperature of 425° F to 488° F, not to exceed 500° F, prior to application. Visual examination of the coating adjacent to the field joints showed blistering and flaking, indicating that it was damaged by the heating process. Failure to completely remove the blistered, flaking coating adjacent to the field joint prior to application of the coating may prevent complete bonding of the coating to the surface of the pipe, may result in shielding of the cathodic protection current, and allow the onset of corrosion. Enable has since changed the field joint coating to SCP SP-2888, a two-part epoxy that does not require the pipe to be heated to high temperatures prior to application. However, PHMSA remains concerned that the coating applied by the previous process over damaged coating adjacent to the field joint may result in corrosion in the area of the field joints.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty

assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in Enable being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2015-5004W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration