



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

June 17, 2022

**VIA ELECTRONIC MAIL TO: [pete.cianci@vector-pipeline.com](mailto:pete.cianci@vector-pipeline.com)**

Mr. Pete Cianci  
President  
Vector Pipeline L.P.  
38705 Seven Mile Road, Suite 490  
Livonia, Michigan 48152

**Re: CPF No. 3-2022-042-NOPV**

Dear Mr. Cianci:

Enclosed please find the Final Order issued in the above-referenced case. It makes a finding of violation and assesses a civil penalty of \$218,647. When the civil penalty has been paid, this enforcement action will be closed. Service of the Final Order by e-mail is effective upon the date of transmission and acknowledgement of receipt as provided under 49 C.F.R. § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

ALAN KRAMER  
MAYBERRY

Digitally signed by ALAN  
KRAMER MAYBERRY  
Date: 2022.06.17  
08:25:01 -04'00'

Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

Enclosures (Final Order and NOPV)

cc: Mr. Gregory Ochs, Director, Central Region, Office of Pipeline Safety, PHMSA  
Ms. Teresa Wilson, Vice President, Gas Transmission & Midstream Operations U.S.,  
Enbridge, [teresa.wilson@enbridge.com](mailto:teresa.wilson@enbridge.com)  
Ms. Cynthia Hansen, Executive Vice President and President, Gas Transmission &  
Midstream, Enbridge, [cynthia.hansen@enbridge.com](mailto:cynthia.hansen@enbridge.com)  
Mr. Nathan Atanu, Manager, Operational Compliance, Enbridge, [nathan.atanu@enbridge.com](mailto:nathan.atanu@enbridge.com)  
Mr. Garrett Wilkie, Director, Operational Excellence, Enbridge, [garrett.wilkie@enbridge.com](mailto:garrett.wilkie@enbridge.com)

**CONFIRMATION OF RECEIPT REQUESTED**

**U.S. DEPARTMENT OF TRANSPORTATION  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION  
OFFICE OF PIPELINE SAFETY  
WASHINGTON, D.C. 20590**

In the Matter of	)	
	)	
Vector Pipeline L.P.,	)	
a subsidiary of Enbridge Inc.,	)	CPF No. 3-2022-042-NOPV
	)	
Respondent.	)	
	)	

**FINAL ORDER**

On April 12, 2022, pursuant to 49 C.F.R. § 190.207, the Director, Central Region, Office of Pipeline Safety (OPS), issued a Notice of Probable Violation (Notice) to Vector Pipeline L.P. (Respondent), a subsidiary of Enbridge Inc.<sup>1</sup> The Notice proposed finding that Respondent had violated the pipeline safety regulations in 49 C.F.R. Part 192 and proposed a civil penalty of \$218,647. Enbridge, Inc., on behalf of Respondent, responded to the Notice and did not contest the allegations of violation or the proposed civil penalty.

Based upon a review of all of the evidence, pursuant to § 190.213, I find Respondent violated the pipeline safety regulation listed below, as more fully described in the enclosed Notice, which is incorporated by reference:

49 C.F.R. § 192.603(a) (**Item 1**) — Respondent failed to operate a segment of pipeline in accordance with Part 192, Subpart L.

This finding of violation will be considered a prior offense in any subsequent enforcement action taken against Respondent. In accordance with 49 C.F.R. § 190.223, Respondent is assessed a civil penalty in the amount of **\$218,647**.

Payment of the civil penalty must be made within 20 days of service. Federal regulations (49 C.F.R. § 89.21(b)(3)) require such payment to be made by wire transfer through the Federal Reserve Communications System (Fedwire), to the account of the U.S. Treasury. Detailed instructions are contained in the enclosure. Questions concerning wire transfers should be directed to: Financial Operations Division (AMK-325), Federal Aviation Administration, Mike Monroney Aeronautical Center, 6500 S MacArthur Blvd, Oklahoma City, Oklahoma 79169.

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<sup>1</sup> US SEC Form 10-K, Enbridge Inc., available at <https://www.enbridge.com/investment-center/reports-and-sec-filings/sec-filings/sec-filing-details?docId=264778> (last accessed June 10, 2022).

The Financial Operations Division telephone number is (405) 954-8845.

Failure to pay the \$218,647 civil penalty will result in accrual of interest at the current annual rate in accordance with 31 U.S.C. § 3717, 31 C.F.R. § 901.9 and 49 C.F.R. § 89.23. Pursuant to those same authorities, a late penalty charge of six percent (6%) per annum will be charged if payment is not made within 110 days of service. Furthermore, failure to pay the civil penalty may result in referral of the matter to the Attorney General for appropriate action in a district court of the United States.

The terms and conditions of this order are effective upon service in accordance with 49 C.F.R. § 190.5.

**ALAN KRAMER**  
**MAYBERRY**

Digitally signed by ALAN  
KRAMER MAYBERRY  
Date: 2022.06.17  
08:24:02 -04'00'

June 17, 2022

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Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

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Date Issued



U.S. Department  
of Transportation  
**Pipeline and Hazardous  
Materials Safety  
Administration**

901 Locust Street, Suite 480  
Kansas City, MO 64106

**NOTICE OF PROBABLE VIOLATION  
and  
PROPOSED CIVIL PENALTY**

**VIA ELECTRONIC MAIL TO:** [cynthia.hansen@enbridge.com](mailto:cynthia.hansen@enbridge.com),  
[michael.mcgrath@enbridge.com](mailto:michael.mcgrath@enbridge.com), and [nathan.atanu@enbridge.com](mailto:nathan.atanu@enbridge.com)

April 12, 2022

Ms. Cynthia Hansen  
EVP & President GTM  
Vector Pipeline, L.P.  
5400 Westheimer Court  
Houston, TX 77056

**CPF 3-2022-042-NOPV**

Dear Ms. Hansen:

From September 17-18, 2020, a representative of the Michigan Public Service Commission, acting as an interstate agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.), investigated an incident at Vector Pipeline, L.P.'s (Vector) Athens Compressor Station in Calhoun County, Michigan.

As a result of the investigation it is alleged that Vector has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item investigated and the probable violation is:

**1. § 192.603 General provisions.**

**(a) No person may operate a segment of pipeline unless it is operated in accordance with this subpart.**

On September 16, 2020, Vector Pipeline, L.P. (Vector) did not operate its Athens Compressor Station, located in Calhoun County, Michigan, in accordance with Part 192 Subpart L –

Operations. When starting a compressor unit that was previously out-of-service for maintenance, natural gas was released and ignited (i.e. the “Incident”), causing \$72,599 in damages as reported by Vector.

Within Subpart L – Operation, 49 CFR § 192.605(b)(6) requires preparation and following a manual of written procedures to provide safety during maintenance and operations. The required procedures are to provide for safety and must address maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service; and, starting, operating and shutting down gas compressor units.

Investigation showed that Vector did not operate the Athens Compressor Station in a safe manner in accordance with Subpart L – Operations. A compressor unit had been isolated for maintenance by previously closing the compressor unit’s suction and discharge valves. The body bleeds on the suction and discharge valves were also opened, as part of, or in preparation for, the maintenance activity. When the compressor unit was started on September 16, 2020, the valve body bleeds had been left open, venting natural gas to the atmosphere that ignited.

A review of Vector’s written procedures and implementation of those procedures showed them to be inadequate to provide safety and prevent the Incident of September 16, 2020 from occurring. Vector’s procedure for ensuring valves were opened or closed for startup after maintenance was a checklist for lockout/tagout. This checklist did not contain the body bleed valves. Although the opening of the body bleed valves was communicated verbally to the responsible person for lock out/tagout, the body bleed valves themselves were not tagged or denoted on the checklist. This subsequently led to the body bleed valves being left open during the start-up of the facility. Vector’s submission of the revised 30-day report clearly states that inadequate procedures were the cause of the incident.

#### Proposed Civil Penalty

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed \$209,002 per violation per day, with a maximum penalty not to exceed \$2,090,022.

We have reviewed the circumstances and supporting documentation involved for the above probable violation(s) and recommend that you be preliminarily assessed a civil penalty of \$218,647 as follows:

Item number  
1

PENALTY  
\$218,647

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Enforcement Proceedings*. Please refer to this document and note the response options. All material you submit in response to this enforcement action may be 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).

Following the receipt of this Notice, you have 30 days to submit written comments, or request a hearing under 49 CFR § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order. If you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from the receipt of this Notice. This period may be extended by written request for good cause.

In your correspondence on this matter, please refer to **CPF 3-2022-042-NOPV** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A. Ochs  
Director, Central Region, Office of Pipeline Safety  
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*