



ENTERPRISE PRODUCTS PARTNERS L.P.
ENTERPRISE PRODUCTS GP, LLC
(General Partner)

ENTERPRISE PRODUCTS OPERATING, LLC

August 28, 2014



Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
8701 South Gessner, Suite 1110
Houston, TX 77074

Attn: Mr. R. M. Seeley
Director, Southwest Region, PHMSA
Via FedEx

Re: CPF No. 4-2014-5006
Notice of Probable Violation and Proposed Compliance Order
Enterprise Products Operating LLC ("Enterprise")

Dear Mr. Seeley,

On April 8, 2014, the Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) issued a Notice of Probable Violation (NOPV) and Proposed Compliance Order (PCO) to Enterprise Products Operating, LLC (Enterprise or the Company). On July 9, 2014, Enterprise responded to the NOPV and PCO with a formal request for a hearing. In that request for a hearing, Enterprise expressed its desire to meet with the Agency before a formal hearing to discuss the issues raised in the NOPV and resolve them amicably. On July 30, 2014, this meeting was held at PHMSA's office in Houston, TX. This letter memorializes the discussions at the meeting and serves as the Company's formal and final response to the NOPV and PCO.

Based on the discussions of the July 30, 2014 clarification meeting, Enterprise's understanding of the Notice issued by PHMSA is as follows:

1. It is not PHMSA's position or intent to have the industry solely qualify/utilize procedures for in-service/maintenance welding based on Section 5 of API 1104.
2. PHMSA recognizes Appendix B for in-service/maintenance welding despite the absence of a reference to it in 49 CFR Part 195.
3. PHMSA recognizes that Section 5 in API 1104 (and ASME Section IX) is intended for new construction applications and that there is currently a gap in the Federal Regulations pertaining to procedure qualification requirements for in-service/maintenance welding.
4. PHMSA has indicated that procedure qualifications for in-service/maintenance welding shall follow the requirements of Section 5 and Appendix B of API 1104. If not excluded by alternative requirements in Appendix B, all essential variables within Section 5 shall apply during qualifications and any future amendments to said procedure(s).

At the conclusion of the meeting, PHMSA stated that Enterprise's completion of in-service experimental trials and establishment of new in-service welding procedures has satisfied all required actions outlined in this Notice. The new in-service welding procedures were established based on previous and recent experimental trials, the results of which met and

exceeded the requirements established in Section 5 and Appendix B of API 1104. Please reference Exhibit A for the six (6) new in-service welding procedures.

Further, PHMSA indicated that additional "supplementary" language/clarification can be incorporated into the Final Order with respect to Appendix B applying to in-service welds and not solely Section 5.

Contingent upon PHMSA's agreement that this letter accurately reflects the July 30 meeting, that clarification regarding the proper standard for qualifying in-service weld will be included in the Final Order, and that Enterprise has satisfied the required actions set forth in the Notice, Enterprise withdraws its request for a hearing.

Should you have any questions, require further information in connection with the above or wish to discuss this matter in greater detail, please do not hesitate to contact our office. Enterprise welcomes the opportunity to work with the Agency in the safe operations of our pipeline system.

Sincerely,

A handwritten signature in dark ink, appearing to read "Graham Bacon", is written over a light grey rectangular background.

Graham Bacon
Group Sr. Vice President, Operations & EHS&T

Attachment