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October 22, 2010

Mr. Byron Coy  
Director, Eastern Region PHMSA  
820 Bear Tavern Road, Suite 306  
West Trenton, NJ 08628

**RE: CPF 1-2010-5006M**

Dear Mr. Coy:

In response to your Notice of Amendment dated September 23, 2010 (NOA), Enbridge contests the NOA on the basis that the subject matter of the NOA was addressed in 2009 in response to an audit performed in 2008 by the New York Public Service Commission (NYPSC). In support, Enbridge has enclosed sufficient documentation of the procedure change, including correspondence with representatives of the NYPSC. Enbridge submitted the amendment on December 22, 2009. Enbridge believes the revised procedure and SCADA changes meet the requirements set forth in 49 CFR Part 195.428(a). At this time, Enbridge is not requesting a hearing on this matter.

**PHMSA Finding:**

*"Enbridge O&M Procedure (EP2049QR) requires a test of the pressure monitoring devices, but not of the SCADA system shutdown alarm which provides the indication that an over-pressure condition exists.*

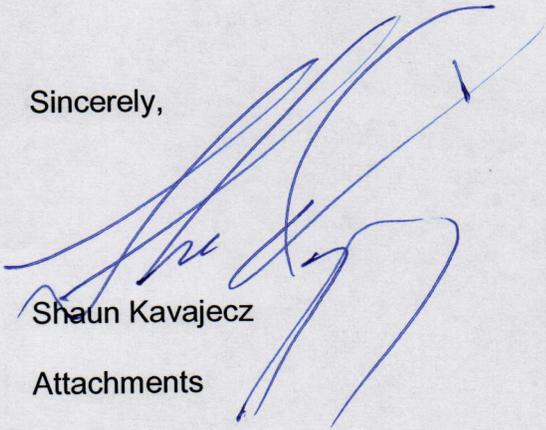
*Enbridge needs to revise its O&M procedures to include provisions to test the SCADA system shutdown alarm in order to meet the requirements of 195.402(a) so that they can inspect and test each pressure limiting device as required by 195.428(a)".*

**Enbridge Response:**

Upon identification of the apparent deficiency noted by the NYPSC in a field audit of Enbridge Line 10 conducted on October 13, 2008, Enbridge revised procedure EP2049QR (attached) and made the applicable changes in the SCADA system. The procedure was revised to include a step to test the SCADA system alarm by forcing a signal to the PLC/SCADA during the testing of the pressure transmitter. This test confirms that the SCADA system receives the signal from the transmitter and would then initiate appropriate actions within the station PLC. Evidence of these changes and inspections using the new procedure was submitted to the NYPSC in an email dated December 22, 2009. Based on feedback from the NYPSC Inspector in an email dated December 30, 2009, Enbridge believed that this issue had been resolved.

We trust that the information contained herein appropriately addresses the finding identified in your Notice of Amendment letter. However, we remain available to discuss any specific aspects or provide further details, if required.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Shaun Kavajecz', is written over the typed name. The signature is fluid and cursive, with a large loop at the end.

Shaun Kavajecz

Attachments

cc. Steve Irving, Enbridge

REPORT: JPPRINT

**Job Plan Report**

**Job Plan:** EP2049QR  
**Description:** Pressure Transmitter, Inspect and Test - Annual for Crude & Semi-Annual for NGL  
**Lead Craft:**  
**WO Priority:** 1  
**Downtime:** N  
**Interruptible:** N  
**Duration:** 0.5

OP	Description	Hours
10	Enter proper notation in the pressure recorder.	0
20	Disable device in HMI.	0
30	Flush line to remove unwanted liquid and/or air.	0
40	Use gauge and compare pressure.	0
50	Ensure correct circuit prior to checking the current loop circuit.	0
60	If PLC is configured, then enter ?YES? or ?NO? in the observation field of the Maximo work order to confirm witnessing of cascade shutdown alarm.	0
70	Time to Complete Job Plan	0.5

**From:** patrick\_raichel@dps.state.ny.us [mailto:patrick\_raichel@dps.state.ny.us]  
**Sent:** Wednesday, December 30, 2009 7:55 AM  
**To:** Jay Johnson  
**Subject:** Re: Follow-up on Pressure Transmitter questions ..

Thanks for getting back to me Jay. That should do it on my end. I will be forwarding the info to Eastern Region PHMSA with the recommendation to close out the issue and the audit.

Patrick J. Raichel  
UE 2, Gas Safety, NYS DPS  
Ellicott Square Bldg., Room 1050  
295 Main St.  
Buffalo, NY 14203  
(716) 847 - 5028

-----Jay Johnson <Jay.Johnson@enbridge.com> wrote: -----

To: "patrick\_raichel@dps.state.ny.us" <patrick\_raichel@dps.state.ny.us>  
From: Jay Johnson <Jay.Johnson@enbridge.com>  
Date: 12/22/2009 02:17PM  
cc: David Hoffman <David.Hoffman@enbridge.com>, Marc Curry  
<Marc.Curry@enbridge.com>, Dean Rawson <Dean.Rawson@enbridge.com>, Brian Buck  
<Brian.Buck@enbridge.com>, Tom Peterson <tom.peterson@enbridge.com>  
Subject: Follow-up on Pressure Transmitter questions ..

Hi Pat ,

Just a follow-up up on my e-mail with attachments from January 8<sup>th</sup>, 2009. In that e-mail we talked about the proposed procedural change which will simulate a locally controlled cascade shutdown via the PLC when the pressure transmitters hit their set points. Since that time we have undertaken a Program to made the necessary changes in all of our Station PLCs, not just New York. This is documented in the PLC Update pdf. The revised procedure which outlines the steps is documented in the JP2049QR Maximo pdf. Documentation of the completed procedure is found in the Buf EP2049 pdf. There are a series of Work Orders in this pdf which include Tonawanda Station Main Line pressure transmitters which trigger the Station PLC alarms and those that are not configured to work with the Station PLCs. These are additional transmitters for remote readings for the Control Center only.

Hopefully this answers your questions and we can close the loop on this issue. If you have any further questions please feel free to contact me.

Jay

JAY A JOHNSON  
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