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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.