

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

December 17, 2015

J. Andrew Drake
Vice President, Operations & EHS
Algonquin Gas Transmission Co. (Spectra Energy Corp)
5400 Westheimer Court
Houston, TX 77056

CPF 1-2015-1027M

Dear Mr. Drake:

From October 16-22, 2015, an inspector from the Connecticut Department of Energy and Environmental Protection (CT DEEP) acting as agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code inspected the Algonquin Gas Transmission's (AGT) (a subsidiary of Spectra Energy Corp)(Spectra) main construction work (Spectra's AIM Project) along the pipeline right-of-way west of Milestone Road in Danbury, Connecticut.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within AGT's plans or procedures, as described below:

1. §192.225 Welding procedures.

(a) Welding must be performed by a qualified welder or welding operator in accordance with welding procedures qualified under section 5, section 12, or Appendix A of API Std 1104 (incorporated by reference, *see* §192.7) or section IX ASME Boiler and Pressure Vessel Code (BPVC) (incorporated by reference, *see* §192.7), to produce welds which meet the requirements of this subpart. The quality of the test welds used to qualify welding procedures must be determined by destructive testing in accordance with the referenced welding standard(s).

AGT's welding procedure specification is inadequate in that it does not specify the size of the root bead opening. API 1104 section 5.3.2.4 and section 12.4.2.5 both require that the welding procedure specification shall include the size of the root bead opening.

AGT was using weld procedure AIM-BMX-423.0 for the Spectra AIM project. The operator's representative said that after the size of the root bead was brought to his attention, AGT revised

its welding procedure specification to identify that the root opening shall be 1/16" to 5/32". This was established as the test weld for this procedure was made using a root opening in this range.

Evidence is based on personal observations, photographs taken, procedures reviewed by the CT DEEP inspector, and statements made by operator representatives.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. 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). 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, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that AGT maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Byron Coy, PE, Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, W. Trenton, NJ 08628, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2015-1027M** and, for each document you submit, please provide a (signed) copy in electronic format whenever possible. Smaller files may be emailed to Byron.Coy@dot.gov. Larger files should be sent on a CD accompanied by the original (signed) paper copy to the Eastern Region Office.

Sincerely,

Byron Coy, P.E.
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Cc: Karl Baker, CT DEEP

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