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Enbridge
5400 Westheimer Court
Houston, Texas 77056

March 3, 2017

Mr. Robert Burrough
Acting Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road
Suite 103
West Trenton, NJ 08628

**RE: Texas Eastern Transmission, LLC Response
Warning Letter
CPF 1-2017-1004W**

Dear Mr. Burrough,

On September 16, 2015¹, a representative from the Pipeline Hazardous Material Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code, inspected the Bailey East Mine Panel 1L Project of Texas Eastern Transmission, L.L.C (TETLP), a subsidiary of Spectra Energy Partners, LP, (SEP²), in Greene County, Pennsylvania.

On February 6, 2017, PHMSA issued the above referenced Warning letter alleging one (1) probable violation of the pipeline safety regulations. The Warning letter reads as follows: "As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:"

1. § 192.303 Compliance with specifications or standards

PHMSA Finding

Texas Eastern Transmission, LP (Spectra Energy Partners, LP) failed to construct transmission pipelines on the Holbrook Discharge Bailey East Mine Panel L1 Project in Greene County, Pennsylvania in accordance with §192.303. Specifically, Texas Eastern failed to follow its construction specification number CS-PL 1.7, Section I of II revised 12/12/2012, paragraph 13E5.4. The procedures states in part: "When using high voltage type

¹ The Warning Letter indicates that the inspection date as August 16, 2015. The inspection was conducted on September 16, 2015.

² On February 27, 2017, Enbridge Inc. and Spectra Energy Corp closed their merger transaction. Enbridge Inc. now indirectly controls the general partner of Spectra Energy Partners, LP (SEP), a master limited partnership, which continues to indirectly own Texas Eastern Transmission, LP.

holiday detectors (13C12.1), holiday inspection along the ROW shall be 3000V for single layer FBE...”

During the inspection, a PHMSA inspector observed holiday detection (jeeping) on the L30 segment of the Holbrook Discharge Bailey East Mine Panel L1 project. Jeeping was being conducted along the ROW on single layer FBE. Construction personnel confirmed the voltage setting on the Spy modes 780 high voltage holiday detector that was being utilized. The voltage setting displayed was 2350 V.

Thus, Texas Eastern failed to follow its written specification by using 2350V for jeeping single layer FBE on the ROW instead of the required 3000V.

TETLP Response

TETLP acknowledges that the holiday detector utilized a 2350V for jeeping a single layer FBE, instead of 3000V as required by the construction specifications. TETLP recognizes that the DOT regulations require that each transmission line must be constructed in accordance with comprehensive written specifications or standards, and thus TETLP is not contesting the finding.

While TETLP acknowledges the holiday detector was not set to the voltage stated in the written specifications, TETLP maintains that the 2350V setting on the holiday detector equipment was technically adequate for jeeping the pipeline, and thus pipeline safety was not compromised. The NACE standard, SP0490-2007 – *Holiday Detection of Fusion-Bonded Epoxy External Pipeline Coatings of 10 to 30 mil*, provides recommended techniques in the operation of holiday detector equipment for fusion-bonded epoxy (FBE) pipeline coatings prior to on-site installation and also provides the minimum recommended voltages for various coating thicknesses.

The range of coating thickness for a single layer FBE is 16 – 18 mils. NACE SPO490-2007 recommends a minimum voltage of 2,100 – 2,225 V when utilizing a holiday detector for single layer FBE. Thus, TETLP’s construction specification exceeded the minimum recommended voltage by requiring 3000V for jeeping a single layer FBE, and coating holidays would have been identified with the setting utilized.

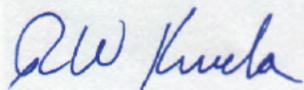
Following the inspection, TETLP implemented process controls to assure contractors are aware of voltage setting requirements in TETLP’s written specifications prior to jeeping.

TETLP takes this finding seriously, and we have already implemented corrective actions prior to receiving the Warning Letter.

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Please call me at (713) 627-6388 if you need additional information.

Sincerely,

A handwritten signature in blue ink that reads "Rick Kivela". The signature is written in a cursive style with a large, stylized "R" and "K".

Rick Kivela
Director, Operational Compliance