

## NOTICE OF AMENDMENT

### OVERNIGHT EXPRESS DELIVERY

October 30, 2017

Michelle Harradence  
VP Gas Transmission & Midstream Operations  
Texas Eastern Transmission, LP (Enbridge Inc.)  
5400 Westheimer Court  
Houston, TX 77251-1642

**CPF 1-2017-1016M**

Dear Ms. Harradence:

On August 1-2, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Texas Eastern Transmission, LP a subsidiary of Enbridge Inc. (Enbridge); Lebanon Extension in Pennsylvania.

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

**1. § 192.303 Compliance with specifications or standards.**

**Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.**

Enbridge's written specifications or standards for constructing each transmission line in accordance with 49 C.F.R. Part 192 were inadequate. Specifically, Enbridge's Construction Specifications failed to restrict miter joint deflection as specified in § 192.233 (a).

Section 192.233 (a) states, "A miter joint on steel pipe to be operated at a pressure that produces a hoop stress of 30 percent or more of SMYS may not deflect the pipe more than 3°."

During the inspection, the PHMSA inspector requested Enbridge's construction specifications or standards addressing miter joint requirements. Enbridge provided Spectra Energy Construction

Specification – *Onshore Compressor Stations - CS1.7*, revised 02/22/2016 (Procedure). Regarding miter joints, the Enbridge Procedure states "Miter joints are not to be performed without written approval from the Company's Metallurgical Services", but did not restrict a miter joint on steel pipe to be operated at a pressure that produces a hoop stress of 30 percent or more of SMYS to a 3° deflection.

Therefore, Enbridge written specifications and standards for construction were inadequate regarding the requirements of § 192.233 (a).

## 2. § 192.303 Compliance with specifications or standards.

**Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.**

Enbridge's written specifications or standards for constructing each transmission line in accordance with 49 C.F.R. Part 192 were inadequate. Specifically, Enbridge's Construction Specifications failed to require the determination of the design pressure for steel pipe to be in accordance with the formula specified in § 192.105 (a).

Section 192.105 (a) states in part:

“(a) The design pressure for steel pipe is determined in accordance with the following formula:

$$P = (2 \text{ St/D}) \times F \times E \times T”$$

During the inspection, the PHMSA inspector requested Enbridge's design and construction specifications regarding design pressure requirements for steel pipe. Enbridge provided Enbridge Construction Design Specification – *Onshore Pipelines – DS-PL1.9*, revised 06/12/2017 (Procedure). Enbridge's Procedure did not have a requirement for the design pressure for steel pipe to be determined in accordance with the formula:  $P = (2 \text{ St/D}) \times F \times E \times T$ .

Therefore, Enbridge's written specifications and standards for construction were inadequate regarding the requirements of § 192.105 (a).

## 3. § 192.303 Compliance with specifications or standards.

**Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.**

Enbridge's written specifications or standards for constructing each transmission line in accordance with 49 C.F.R. Part 192 were inadequate. Specifically, Enbridge's Construction Specifications failed to require that each buried or submerged pipeline installed after July 31, 1971 be protected against external corrosion as specified in § 192.455 (a).

Section 192.455 (a) states:

“(a) Except as provided in paragraphs (b), (c), and (f) of this section, each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion, including the following:

- (1) It must have an external protective coating meeting the requirements of §192.461.
- (2) It must have a cathodic protection system designed to protect the pipeline in accordance with this subpart, installed and placed in operation within 1 year after completion of construction.”

During the inspection, the PHMSA inspector requested Enbridge’s construction specifications or standards regarding requirements for the installation of cathodic protection and external corrosion control for newly constructed transmission lines. Enbridge provided Spectra Energy Construction Specification – *Painting and Coating CS-ABC.2, Section 11*, revised 04/18/2016 (Procedure). The Procedure did not require that each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion as required by § 192.455 (a).

Therefore, Enbridge’s written specifications and standards for construction were inadequate regarding the requirements of § 192.455 (a).

### Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. § 190.206). 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 Enbridge maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Acting Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. Please refer to **CPF 1- 2017-1016M** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to [robert.burrough@dot.gov](mailto:robert.burrough@dot.gov). Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Additionally, if you choose to respond to this (or any other case), please ensure that any response letter pertains solely to one CPF case number.

Sincerely,

Robert Burrough  
Acting Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

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