

January 24, 2019

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road
Suite 300
West Trenton, NJ 08628

**RE: Steckman Ridge, LP. Response
Notice of Probable Violation (NOPV)
CPF 1-2018-1025**

Dear Mr. Burrough,

From January 22, 2018 to August 24, 2018, representatives from the Pipeline Hazardous Material Safety Administration (PHMSA), inspected records relative to Steckman Ridge LP, a subsidiary of Spectra Energy Partners, LP (SEP¹), as part of the “Spectra TX Eastern North” system inspection. The inspection included the Steckman Ridge Storage facility in Bedford County, Pennsylvania.

On December 26, 2018, PHMSA issued the above reference Notice of Probable Violation (NOPV) and Proposed Compliance Order alleging one (1) violation of pipeline safety regulations. The following is a brief summary of PHMSA’s findings and Steckman Ridge’s response.

1. §192.616 Public Awareness

PHMSA Concern

Steckman Ridge failed to implement portions of its written continuing public education program. Specifically, Steckman Ridge failed to follow Table 4 of its External Communication Plan, versions dated 4/29/15 and 2/22/17 (EC Plans), by not distributing message mailings related to storage facilities in accordance with the frequency requirements therein.

Steckman Ridge's EC Plans included *Table 4: Enhanced Message Content and Methods Stakeholders - Not Key* (Table 4). Table 4 outlined unique facility message delivery frequency for (U.S. gas) Affected Public (located within one mile of the unique facility) as message mailing at least every two years, (U.S. gas) Local Public Officials (with jurisdiction for geographic area of the unique facility) and (U.S. gas) First Responders (with jurisdiction

¹ 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 Algonquin Gas Transmission, L.L.C.

for geographic area of the unique facility) as message delivery at least every year, respectively. These unique facilities include compressor stations, LNG facilities, and storage facilities. Records of these unique facility message mailings, dating back to 2015 and related to storage facilities, were requested during the inspection, and could not be provided by Steckman Ridge at the time.

In an email dated October 11, 2018, Steckman Ridge personnel stated:

"Brochures specific to storage facilities of any type have not been mailed ... Compressor station and LNG brochures were mailed to residents, businesses, emergency officials, schools and farmers August 31, 2016. Storage brochures were not mailed but they would have gone to residence, businesses, emergency officials, schools, and farmers."

Therefore, Steckman Ridge failed to implement its written continuing public education program by failing to distribute storage facility mailings in accordance with Table 4 of its EC Plans.

Steckman Ridge Response

Steckman Ridge had updated its External Communication Plan to include messages related to storage fields as a proactive measure prior to gas storage being covered by federal regulations under 49 CFR Parts 191 and 192². However, Steckman Ridge acknowledges that unique facility message mailings related to storage facilities had not yet been distributed at the delivery frequency specified in Table 4 of the External Communication Plan dated 04/29/2015 and 02/22/2017, and thus Steckman Ridge does not contest the finding.

As specified in the Proposed Compliance Order, Steckman Ridge will distribute messaging specific to storage facilities to applicable stakeholders within 60 days after the Final Order, and provide documentation of completion to PHMSA within 90 days after the Final Order.

Steckman Ridge takes these issues very seriously, and we are committed to addressing these issues in an expeditious manner.

Please call me at (713) 627-5008 if you need additional information.

Sincerely,



Rick Kivela
Manager, Operational Compliance

² PHMSA issued an Interim Final Rule on December 19, 2016 (Docket PHMSA-2016-0016). The Interim Final Rule became effective on January 18, 2017.