U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

January 8, 2019

Michael LeBlanc
Senior Vice President - Operations
EnLink LBU-ORV
60995 Derrick Road
Plaquemine, LA 70764

CPF 1-2019-6002M

Dear Mr. LeBlanc:

From March 20 to May 24, 2018, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected EnLink LBU-ORV's (EnLink) procedures for operation and maintenance of its crude oil pipeline system in the vicinity of Nashport, Ohio.

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

1. **§ 195.11 What is a regulated rural gathering line and what requirements apply?**

   (b) Safety requirements. Each operator must prepare, follow, and maintain written procedures to carry out the requirements of this section. Except for the requirements in paragraphs (b)(2), (b)(3), (b)(9) and (b)(10) of this section, the safety requirements apply to all materials of construction.

   (9) For steel pipelines, comply with subpart H of this part, except corrosion control is not required for pipelines existing on July 3, 2008 before July 3, 2011.

EnLink's procedures for complying with Subpart H of Part 195 were inadequate. Specifically, EnLink's procedures failed to include directions to personnel for examination of the interior surface of pipe when the pipe is exposed and cut out, and for documentation of the results of the inspections.

During the inspection, EnLink's procedures and record form for internal pipe surface examinations were reviewed. The EnLink form for examination of exposed pipe reviewed during the inspection did not have any questions or checkboxes to document the presence or severity of internal corrosion. However, several instances of an examination of a pipe's internal surface were added as comments on the Examination of Exposed Pipe Form, the form which was used to document the external examination of the pipe.

During the verbal exit interview on May 24, 2018, the PHMSA inspector and EnLink personnel discussed a form for comprehensively documenting bell hole inspections, which included internal pipe surface examinations.

EnLink subsequently provided a blank copy of this Excel form for review. Although current records do not reflect the use of this form, the form could be used prospectively to document bell hole inspections. However, the *Hazardous Liquid Pipeline O&M Manual* does not direct personnel to specifically use this form.

Therefore, EnLink's procedures for complying with Subpart H of Part 195 were inadequate.

2. § 195.11 What is a regulated rural gathering line and what requirements apply?

(b) Safety requirements. Each operator must prepare, follow, and maintain written procedures to carry out the requirements of this section. Except for the requirements in paragraphs (b)(2), (b)(3), (b)(9) and (b)(10) of this section, the safety requirements apply to all materials of construction.

(9) For steel pipelines, comply with subpart H of this part, except corrosion control is not required for pipelines existing on July 3, 2008 before July 3, 2011.

EnLink's procedures for complying with Subpart H of Part 195 were inadequate. Specifically, EnLink's procedures failed to provide any reference or guidance to evaluate the remaining strength of an internally corroded pipe.

During the inspection, EnLink's *Hazardous Liquid Pipeline Operation and Maintenance Manual* and *Corrosion Manual* were reviewed. It was found that there were no general references to the commonly used or accepted methods noted in § 195.587 (B31G, R-STRENG), nor were there specific references to any method utilized by EnLink's engineering or integrity group.

Therefore, EnLink's procedures for complying with Subpart H of Part 195 were inadequate.

3. § 195.11 What is a regulated rural gathering line and what requirements apply?

(b) Safety requirements. Each operator must prepare, follow, and maintain written procedures to carry out the requirements of this section. Except for the requirements in paragraphs (b)(2), (b)(3), (b)(9) and (b)(10) of this section, the safety requirements apply to all materials of construction.

(10) For steel pipelines, establish and follow a comprehensive and effective program to continuously identify operating conditions that could contribute to internal corrosion. The program must include measures to prevent and mitigate internal corrosion, such as cleaning the pipeline and using inhibitors. This program must

be established before transportation begins or if the pipeline exists on July 3, 2008, before July 3, 2009.

EnLink's procedures for its program for internal corrosion of its regulated rural gathering line system were inadequate. Specifically, EnLink's *Hazardous Liquid Pipeline O&M Manual* was inadequate in its description of a process to continuously identify operating conditions that would contribute to internal corrosion. Additionally, EnLink's *Corrosion Manual*, Section 6, Internal Corrosion Control did not address hazardous liquid pipeline internal corrosion in detail.

During the inspection, the PHMSA inspector discussed EnLink's operating practices to identify conditions which could contribute to internal corrosion. EnLink personnel described a practice of running cleaning pigs (in-line cleaning tools) through the pipeline, and the inspector requested and subsequently reviewed records that documented the pigging activities. However, the *Hazardous Liquid Pipeline O&M Manual* did not provide a written description of a comprehensive program for cleaning the pipeline or the use of corrosion inhibitors.

The detailed requirements of the *Corrosion Manual* addressing internal corrosion control appeared to be applicable to natural gas pipeline systems only.

Therefore, EnLink's written procedures fail to establish a comprehensive and effective program to continuously identify operating conditions that could contribute to internal corrosion.

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 60 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 EnLink 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, Director, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2019-6002M** 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. 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
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

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