



Enbridge
5400 Westheimer Court
Houston, Texas 77056

January 20, 2020

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

**RE: Texas Eastern Transmission, LP Response
Warning Letter
CPF 1-2020-1001W**

Dear Mr. Burrough,

From August 20, 2019 to August 22, 2019, an inspector from the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected portions of Texas Eastern Transmission, LP's (TETLP) Accident Underground Natural Gas Storage (UNGS) facility in Garrett County, MD.

On January 2, 2020, PHMSA issued a Warning Letter alleging one (1) probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The following is a brief summary of PHMSA's finding and TETLP's response.

PHMSA Finding

1. §192.12 Underground natural gas storage facilities

Texas Eastern failed to meet the integrity monitoring requirements of API RP 1171. Specifically, Texas Eastern failed to demonstrate that it evaluated each occurrence of annular gas that exceeded operator defined threshold levels in accordance with API RP 1171, Section 9.3.2.

Section 9.3.2, Well Integrity Monitoring, states in part:

The operator shall evaluate each annular gas occurrence that exceeds operator or regulatory defined threshold levels determined from well integrity evaluation and from risk assessment.

During the inspection, Texas Eastern was not able to provide documentation of the evaluation of each occurrence of annular gas that exceeded operator-defined threshold levels.

TETLP Response

TETLP acknowledges that the documentation of the evaluation of each occurrence of annular gas that exceeded operator defined threshold levels in accordance with API RP 1171, Section 9.3.2 was not available during the inspection.

TETLP has since made process improvements to ensure that the annular pressures are monitored more frequently and each annular pressure exceedance is evaluated and documented.

TETLP takes these issues seriously and will work expeditiously to resolve them. TETLP had already implemented process control improvements to address this issue prior to receiving this Warning Letter.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Nathan Atanu", with a stylized flourish at the end.

Nathan Atanu
Manager, Operational Compliance