

February 12, 2019

VIA ELECTRONIC TRANSMISSION

Mr. Allan C. Beshore
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

Re: CPF 3-2019-5005M
Express Holdings (USA), LLC Operator Qualification Inspection

Dear Mr. Beshore:

Between November 14, 2016 and February 3, 2017, representatives of Pipeline and Hazardous Safety Administration (PHMSA) inspected Express Holdings (USA), LLC's procedures for Operator Qualification.

In response to the Notice of Amendment (NOA) issued by PHMSA on January 11, 2019, and received electronically by Enbridge on January 11, 2019, we appreciate the opportunity to comment and offer the following response.

PHMSA Finding:

1. §195.505 Qualification Program.

Each operator shall have and follow a written qualification program. The program shall include provisions to: (a) Identify covered tasks.

The Express Holdings (USA), LLC OQ Program is inadequate because it did not include adequate provisions to identify covered tasks in accordance with the four-part definition in §195.501(b)(1) – (4). Specifically, it did not clarify how the provisions in 49 CFR§195.501(b)(1) – (4) were referenced or utilized to identify covered tasks.

Enbridge Response:

As a result of Enbridge acquiring the Express Platte Pipeline system the Operator Qualification Plan that was in place when the inspection was conducted has now been fully transitioned to the Enbridge Liquid Pipelines Operator Qualification Plan. The transition commenced with the Operator Registry Notification that was submitted on July 26, 2018 with an effective date of July 20, 2018 and commenced with the final changes included in the 2019 LP OQ Plan Change Notification submitted on January 11, 2019 with an effective date of January 4, 2019.

Please note that the Enbridge Liquid Pipelines Operator Qualification Plan includes adequate provisions to identify covered tasks in accordance with the four-part definition in §195.501(b)(1) – (4) as shown below.



4.4 Regulation Standard: Four-Part Test Description

Enbridge reviews and evaluates task steps in accordance with the *49 CFR 195 (Subpart G, 49 CFR 195.501)* and *49 CFR 192 (Subpart N, 49 CFR 192.801)* covered task definition using the following four-part criteria:

- Is performed as a requirement of *49 CFR 195* or *49 CFR 192*
- Is an operations or maintenance task
- Is performed on a pipeline facility
- Affects the operation or integrity of the pipeline

Covered tasks, for the purpose of OQ, are those operations tasks meeting all four criteria. In addition, Enbridge has addressed other pipeline-related activities that pose significant risk to the integrity of the pipeline facilities

Should you have any questions or require further information, please contact me at 715-394-1511.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Stafford'.

David Stafford
Manager, US Pipeline Compliance