



November 6, 2020

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Limited Partnership  
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Superior, WI USA

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

Re: CPF 3-2020-5017M

Dear Mr. Ochs:

Between June 10, 2019 and September 13, 2019, representatives of Pipeline and Hazardous Safety Administration (PHMSA) inspected Express Holdings (USA), LLC's procedures for Integrity Management in Casper, WY

In response to the Notice of Amendment (NOA) issued by PHMSA received electronically by Enbridge on October 8, 2020 we appreciate the opportunity to comment and offer the following response.

**PHMSA Finding:**

**1. §195.452 Pipeline integrity management in high consequence areas.**

(a) . . .

(j) *What is a continual process of evaluation and assessment to maintain a pipeline's integrity? –*

**(5) Assessment methods.** An operator must assess the integrity of the line pipe by any of the following methods. The methods an operator selects to assess low frequency electric resistance welded pipe or lap welded pipe susceptible to longitudinal seam failure must be capable of assessing seam integrity and of detecting corrosion and deformation anomalies.

(i) . . .

**(iv) Other technology that the operator demonstrates can provide an equivalent understanding of the condition of the line pipe.** An operator choosing this option must notify OPS 90 days before conducting the assessment, by sending a notice to the address or facsimile number specified in paragraph (m) of this section.

Express Holdings' procedure PI-141, dated 3/20/2018, is inadequate because it does not include the notification to OPS requirement of §195.452(j)(5)(iv) when "other technology" is selected as the assessment tool as part of an integrity assessment. Express Holdings must amend their procedures to include this requirement.

**Enbridge Response:**

The following has been amended through Enbridge MOC:



Enbridge Procedure; PI-141 Assessment Tool Selection; Section 7; Select non-ILI Assessments

Other

- Must notify Office of Pipeline Safety (OPS) 90 days before conducting the assessment (US segments only)

Please see attached revised procedure.

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

Sincerely,

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

David Stafford  
Manager, US Pipeline Compliance