



December 8, 2020

VIA ELECTRONIC MAIL TO: Gregory.Ochs@dot.gov

Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
901 Locust Street, Suite 480
Kansas City, MO 64106

Attn: Mr. Gregory Ochs
Director, Central Region, OPS, PHMSA

Re: CPF 3-2020-5019
Notice of Probable Violation and Proposed Civil Penalty
Enterprise Products Operating, LLC

Dear Mr. Ochs,

Enterprise Products Operating, LLC (Enterprise or the Company) is in receipt of the above referenced Notice of Probable Violation (NOPV) and Proposed Civil Penalty (PCP) dated and received October 13, 2020. Enterprise requested and was granted an extension to respond to this alleged violation until December 13, 2020. Accordingly, this letter constitutes Enterprise's timely response to the subject NOPV.

Item 1:

§ 195.452 Pipeline integrity management in high consequence areas.

(a)

(h) What actions must an operator take to address integrity issues?-

(4) Special requirements for scheduling remediation-(i) Immediate repair conditions. An operator's evaluation and remediation schedule must provide for immediate repair conditions. To maintain safety, an operator must temporarily reduce the operating pressure or shut down the pipeline until the operator completes the repair of these conditions. An operator must calculate the temporary reduction in operating pressure using the formulas referenced in paragraph (h)(4)(i)(B) of this section. If no suitable remaining strength calculation method can be identified, an operator must implement a minimum 20% or greater operating pressure reduction, based on actual operating pressure for two months prior to the date of inspection, until the anomaly is repaired. An operator must treat the following conditions as immediate repair conditions:

Enterprise Products Operating, LLC (Enterprise) failed to implement a pressure reduction as a result of a Safety-Related Condition that could lead to imminent hazard. On June 6, 2019, Enterprise submitted to PHMSA a Safety-Related Condition Report (Report) for Enterprise's East Leg system which stated, "[c]ondition that could lead to an imminent hazard and causes 20% or more reduction in operating pressure". The Report identified the "Date Condition Discovered" as May 28, 2019, and states that Safety-

Related Conditions were discovered on Line ID 600-601-602, MP 52.1 to Kearney (AID 115), on the East Leg Pipeline System (PHMSA SRC 19-152250). However, Enterprise failed to implement a pressure reduction as a result of the Safety-Related Condition. By email dated November 1, 2019, Enterprise stated to PHMSA personnel that “a Temporary Pressure Reduction had not been taken for this specific segment. I have attached the MOC that shows we [Enterprise] did complete this on October 30th.” Records provided by Enterprise show that there were fourteen (14) anomalies indicated by the in-line inspection tool(s) associated with this Safety-Related Condition report. Twelve (12) anomalies were repaired using Type-B sleeves or Petro Sleeves prior to October 30, 2019, without any pressure reduction in place. The measures required by § 195.452 were not implemented by Enterprise for this safety related condition for a period of five months after discovery, in violation of the regulation.

Enterprise Response to Item 1:

Upon discovery of the failure to implement the pressure reduction, Enterprise took immediate steps to ensure the appropriate pressure limits were set on Line ID 600-601-602, MP 52.1 to Kearney (AID 115). Additionally, Enterprise completed an internal investigation to determine the cause of this oversight and to develop recommendations to prevent recurrence.

Enterprise is developing an electronic Management of Change (MOC) workflow that will allow the originator of the pressure modification to track, monitor and confirm when the pressure reduction has been implemented. The Company anticipates that it will be in a position to develop and implement this new process within 90 days of this letter; should this schedule change for any reason Enterprise will notify the Regional Director, Central Region. The revised procedures relevant to this new workflow will be submitted to the Agency.

Should you have any questions, require further information in connection with the above or wish to discuss this matter in greater detail, please do not hesitate to contact our office. Enterprise is committed to public safety, protecting the environment, and operating its pipeline facilities safely and welcomes the opportunity to work with PHMSA regarding the safe operation of our pipelines.

Sincerely,



Graham W. Bacon
Executive Vice President, Chief Operating Officer