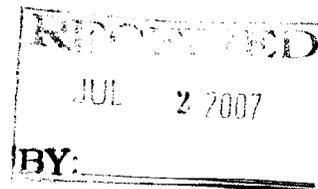


Enbridge Offshore (Gas Gathering) L.L.C.  
1100 Louisiana Suite 3300  
Houston, Texas 77002

**ENBRIDGE™**

June 29, 2007

**CERTIFIED MAIL (7006 0810 0000 1313 8693)  
RETURN RECEIPT REQUESTED**



Mr. Rodrick M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 S. Gessner, Suite 1110  
Houston, Texas 77074

**Re: CPF 4-2007-2001**

Mr. Seeley:

Subsequent to a pipeline safety inspection of Enbridge Offshore (Gas Gathering) L.L.C. 's ("EOGG's") Nautilus Pipeline System on July 24-26, 2006, EOGG has received your Notice of Probable Violation (NOPV), Proposed Civil Penalty and Proposed Compliance Order dated June 4, 2007. Enbridge appreciates the opportunity to respond to this evaluation and trusts that this input will resolve any outstanding issues. It is respectfully requested that each Proposed Civil Penalty and Compliance Order be eliminated or mitigated, as appropriate, based on the information provided in this letter.

The Nautilus Pipeline System was operated by Marathon Gas Transmission, L.L.C. until September 30, 2005. On October 1, 2005, operator responsibilities were assumed by EOGG. At that time there was an initial transfer of maintenance records. A comprehensive review of the records revealed several gaps. EOGG has worked with Marathon over the last 18 months to close these gaps. Additional information was made available by Marathon immediately after the PHMSA inspection and subsequently in March and June, 2007.

**ITEM 1**

**49 CFR 192.477 Internal corrosion control: Monitoring**

Records indicate coupon # D9557 "Garden City Nautilus 30" from SS 207" was installed December 20, 2004 and not removed until December 20, 2005. The coupon installed December 20, 2005 was removed May 4, 2006 and therefore current at the time of the audit.

**RESPONSE**

On March 23, 2007 Marathon provided to EOGG a Baker Petrolite Analytical Services Report dated May 12, 2005. Coupon # D9553 was installed December 21, 2004 and removed May 8, 2005 (see attached). Coupon # D9557 was installed on that date and removed December 20, 2005.

EOGG respectfully requests the Proposed Civil Penalty and Compliance Order be eliminated for this item.

**ITEM 2**

**49 CFR 192.481 Atmospheric corrosion control: Monitoring**

There are no records of offshore atmospheric inspection provided for 2004. Records provided were the 2003 offshore atmospheric inspection by prior owner and 2005 offshore atmospheric inspection by Enbridge. The 2006 offshore atmospheric inspection was not overdue at the time of the inspection.

### **RESPONSE**

On June 18, 2007 Marathon provided to EOGG a copy of their ACC Database Master List-2005 which shows the SS 207, Burns Point and Garden City facilities were inspected on June 24, 2004 and July 2, 2004 (see attached).

EOGG respectfully requests the Proposed Civil Penalty and Compliance Order be eliminated for this item.

### **ITEM 3**

#### **49 CFR 192.745 Valve maintenance: Transmission Lines**

Valve maintenance records for valve #2010 at the Nautilus Plant were not provided for 2004 and 2005. Valve maintenance records for valve # 2010 at the Nautilus Plant were provided for 2003 and 2006.

### **RESPONSE**

The valve maintenance records for valve #2010 for 2004 and 2005 have not been provided to EOGG from Marathon. However, although we do not have the official maintenance records for valve # 2010 for 2004 and 2005, EOGG has attached the Event Log for the Nautilus Facility PLC which shows valve # 2010 was fully operated (per 49 CFR 192.745) on September 14, 2004 and June 11, 2005.

EOGG respectfully requests the Proposed Civil Penalty and Compliance Order be eliminated for this item.

### **SUMMARY**

It is EOGG's hope that each of the three responses listed above are reviewed by PHMSA and the Proposed Civil Penalties and Proposed Compliance Orders are reduced or are eliminated entirely. In lieu of this, and in accordance with 49 CFR 190.211(a), EOGG requests a hearing as soon as possible.

Should you have any questions or require additional clarification, please call John Locantro at 713-353-5672.

Sincerely,



Garry Worone  
Vice President, Operations

JL

Attachments

03-22-07

Russ/Karla - while doing  
this year's records  
indexing, I found this in  
with other offshore records.  
This is the original for your  
records.

Thanks,

D. Boxie

Diane Boxie  
Houston Region - Sr. Admn.  
& Records Coordinator



**Marathon Pipe Line LLC**

5555 San Felipe Road, Room 2426  
Houston, TX 77056  
Telephone 713/296-2441  
Cellular 713/320-1269  
FAX 713/499-8503  
DBoxie@MarathonPetroleum.com



Baker Petrolite

## ANALYTICAL SERVICES REPORT

*The Quality System of Analytical Services is ISO 9001 Certified*

### CORROSION COUPON ANALYSIS

Customer: Marathon Ashland Pipeline	Date Received: 5/9/05
Location: Garden City Gas Plant	Date Analyzed: 5/12/05
Sales Engineer: Brian Hills	Analyzed By: Margaret Dennison
Sample ID: 0505A059	ASR #: 0505A059

Mpy = [(Factor x wt. loss(g))/ Number of days in system]

Location	Appearance	Sample #	Coupon #	Initial Wt.	Final Wt.	Wt. loss	factor	days	mpy	Date In	Date Out
Garden City Gas Plant	Rust coat	86917	D9553	17.0202	17.0080	0.0122	1410	108	0.16	12/21/04	04/08/05

Margaret Dennison

Russ Romero/US/Enbridge  
06/18/2007 08:30 AM

To John Locantro/US/Enbridge@LPL, John  
Brennan/US/Enbridge@LPL  
cc  
bcc  
Subject Fw: DOT info.

Thanks,  
Russ Romero Jr.  
Operations Engineer  
Enbridge Offshore LLC.  
Phone 832-214-1646  
Cell 985-860-8797  
Fax 985-851-4126

----- Forwarded by Russ Romero/US/Enbridge on 06/18/2007 08:32 AM -----



"Adams, Richard L."  
<rladams@marathonpetroleu  
m.com>  
06/18/2007 07:53 AM

To <Russ.romero@enbridge.com>  
cc  
Subject FW: Book1.xls

If you have any problem in opening this please give me a call and I will fax you all the information from the emails.

Richard

---

**From:** Blair, Timothy D.  
**Sent:** Thursday, June 14, 2007 11:06 AM  
**To:** Adams, Richard L.  
**Subject:** Book1.xls

<<Book1.xls>>



FYI on Nautilus system. Book1.xls

**ACC Database  
Master List- January 2005**

Operating Area	System	Segment	Asset Name	Stationing	Asset Type	Evaluation Date	Pipe Supports (Y/N)	Riser Condition	Overall Condition	Comments
Offshore	Nautilus 30" Gas Pipeline	Burns Point - Garden City	Garden City Station		Station	6/24/2004	Y-28 w/o	N/A	Good	Needs FRP saddles installed and touch up paint in some areas.
Offshore	Nautilus 30" Gas Pipeline	Burns Point - Garden City	Burns Point		Station	6/24/2004	N/A	N/A	Fair	Needs touch up paint in some areas.
Offshore	Nautilus 30" Gas Pipeline	Ship Shoal - Garden City	SS 207		Platform	7/2/2004	Y-1 w/o	Good	Excellent	Sub celler deck and above has rust corrosion evident throughout, some minor pitting but nothing over .10. Scheduled to be repainted in 2004. See IR 955-04 dated 7/30/2004. Painting complete on platform 12/2004. Changed rating from Poor to Excellent.



08:19:52.2	[GARCITY1]	TI3071	OK	142.4	CSU M1 TEMP	6/11/05
08:25:31.7	[GARCITY1]	TAL-1125	CFN		STABILIZER COL FEED LOW TMP	6/11/05
08:25:36.8	[GARCITY1]	TAL-1125	OK		STABILIZER COL FEED LOW TMP	6/11/05
08:26:35.7	[GARCITY1]	FALL-8061	CFN		C-8060 CYL. LUBRICATOR NO-FLOW	6/11/05
08:27:25.8	[GARCITY1]	TAL-1125	CFN		STABILIZER COL FEED LOW TMP	6/11/05
08:28:09.6	[GARCITY1]	TAL-1125	OK		STABILIZER COL FEED LOW TMP	6/11/05
08:59:34.2	[GARCITY1]	ZSO/C-8062	CFN		C-8060 BLOWDOWN VALVE POSITION	6/11/05
09:00:03.9	[GARCITY1]	UA-8052	CFN		VFD-8050 FAULT	6/11/05
09:00:08.9	[GARCITY1]	UA-8062	CFN		VFD-8060 FAULT	6/11/05
09:00:15.3	[GARCITY1]	UA-8051	CFN		VFD-8050 ALARM	6/11/05
09:00:20.3	[GARCITY1]	UA-8061	CFN		VFD-8060 ALARM	6/11/05
09:09:03.8	[GARCITY1]	TIC8031SP		450 DEGF	REBOILER TEMP PID SETPOINT	6/11/05
6/11/05 09:09:03.8	[GARCITY1]	TIC8031SP.F_CV set to		450.000	by GARCITY1::	
09:14:25.0	[GARCITY1]	TIC8031SP		475 DEGF	REBOILER TEMP PID SETPOINT	6/11/05
6/11/05 09:14:25.0	[GARCITY1]	TIC8031SP.F_CV set to		475.000	by GARCITY1::	
09:23:19.2	[GARCITY1]	ZSO/C-2010	CFN		RECIVER VALVE POSITION	6/11/05
09:24:48.2	[GARCITY1]	ZSO/C-2010	CFN		RECIVER VALVE POSITION	6/11/05
09:31:46.2	[GARCITY1]	ZSO/C-8062	CFN		C-8060 BLOWDOWN VALVE POSITION	6/11/05
09:34:55.9	[GARCITY1]	HS-8061	OK		COMPR C-8060 LOC/REM SWITCH POSITION	6/11/05
09:35:15.2	[GARCITY1]	UA-8051	OK		VFD-8050 ALARM	6/11/05
09:35:15.2	[GARCITY1]	UA-8052	OK		VFD-8050 FAULT	6/11/05
09:35:16.0	[GARCITY1]	FALL-8061	OK		C-8060 CYL. LUBRICATOR NO-FLOW	6/11/05
09:35:16.0	[GARCITY1]	UA-8063	OK		C-8060 LOCAL STOP ALARM	6/11/05
09:35:16.0	[GARCITY1]	UA-8061	OK		VFD-8060 ALARM	6/11/05
09:35:16.0	[GARCITY1]	UA-8062	OK		VFD-8060 FAULT	6/11/05
09:35:30.5	[GARCITY1]	ZSR-8061	CFN		P-8060 PRE-LUBE RUN STATUS	6/11/05
09:35:30.5	[GARCITY1]	ZIR-8062	COS		COMPR COOLING FAN E-8060 RUN/OFF STATUS	6/11/05
09:35:43.8	[GARCITY1]	ZIR-8060	COS		VFD/COMPR C-8060 RUN/OFF STATUS	6/11/05
09:35:51.2	[GARCITY1]	ZSO/C-8063	CFN		C-8060 DISCHARGE VALVE POSITION	6/11/05
09:35:51.2	[GARCITY1]	ZSO/C-8061	CFN		C-8060 SUCTION VALVE POSITION	6/11/05
09:36:05.2	[GARCITY1]	PXI-1123B_A/M	COS		COMPR RECYCLE PIC-1123 AUTO/MAN STATUS	6/11/05
09:36:05.6	[GARCITY1]	ZSR-8061	OK		P-8060 PRE-LUBE RUN STATUS	6/11/05
09:36:06.2	[GARCITY1]	PXI-1124B_A/M	COS		COMPR SPEED PIC-1124 AUTO/MAN STATUS	6/11/05
09:36:06.2	[GARCITY1]	ZSO/C-8062	CFN		C-8060 BLOWDOWN VALVE POSITION	6/11/05
09:37:08.2	[GARCITY1]	LALL-8062	OK		SUCTION SCRUBBER LOW LEVEL	6/11/05
09:38:14.2	[GARCITY1]	TI3071	HIHI	150.5	CSU M1 TEMP	6/11/05
09:49:27.2	[GARCITY1]	PXI-1124B_A/M	COS		COMPR SPEED PIC-1124 AUTO/MAN STATUS	6/11/05
09:49:30.7	[GARCITY1]	ZIR-8060	COS		VFD/COMPR C-8060 RUN/OFF STATUS	6/11/05
09:49:30.7	[GARCITY1]	ZIR-8062	COS		COMPR COOLING FAN E-8060 RUN/OFF STATUS	6/11/05
09:49:36.2	[GARCITY1]	ZSO/C-8063	CFN		C-8060 DISCHARGE VALVE POSITION	6/11/05
09:49:42.2	[GARCITY1]	ZSO/C-8061	CFN		C-8060 SUCTION VALVE POSITION	6/11/05
09:49:47.2	[GARCITY1]	ZSO/C-8062	CFN		C-8060 BLOWDOWN VALVE POSITION	6/11/05
09:49:57.2	[GARCITY1]	PXI-1123B_A/M	COS		COMPR RECYCLE PIC-1123 AUTO/MAN STATUS	6/11/05
09:49:57.5	[GARCITY1]	LALL-8062	CFN		SUCTION SCRUBBER LOW LEVEL	6/11/05
09:50:01.7	[GARCITY1]	ZIR-8052	COS		COMPR COOLING FAN E-8050 RUN/OFF STATUS	6/11/05
09:50:01.7	[GARCITY1]	ZSR-8051	CFN		P-8050 PRE-LUBE RUN STATUS	6/11/05
09:50:12.1	[GARCITY1]	ZIR-8050	COS		VFD/COMPR C-8050 RUN/OFF STATUS	6/11/05
09:50:17.2	[GARCITY1]	ZSO/C-8051	CFN		C-8050 SUCTION VALVE POSITION	6/11/05
09:50:17.2	[GARCITY1]	ZSO/C-8053	CFN		C-8050 DISCHARGE VALVE POSITION	6/11/05
09:50:22.3	[GARCITY1]	ZSO/C-8051	CFN		C-8050 SUCTION VALVE POSITION	6/11/05

07/11/05 13:52:34.3 [GARCITY1] TIC8031SP.F_CV set to	350.000 by GARCITY1::		
14:31:17.6 [GARCITY1] TAL-1125	CFN	ALARM	STABILIZER COL FEED LOW TMP 6/11/05
14:39:50.0 [GARCITY1] TAL-1125	OK	CLEAR	STABILIZER COL FEED LOW TMP 6/11/05
6/11/05 14:44:41.2 [GARCITY1] HMCSU01.F_CV set to	1.000 by GARCITY1::		
14:44:41.2 [GARCITY1] HMCSU01			CSU RESET COMMAND 6/11/05
6/11/05 15:04:41.1 [GARCITY1] HSO-2010.F_CV set to	1.000 by GARCITY1::		
15:04:41.1 [GARCITY1] HSO-2010			PIPELINE INLET VALVE OPEN CMD 6/11/05
15:04:46.2 [GARCITY1] ZSO/C-2010	CFN	TRANSIT	RECIVER VALVE POSITION 6/11/05
15:06:18.2 [GARCITY1] ZSO/C-2010	CFN	OPEN	RECIVER VALVE POSITION 6/11/05
15:06:41.2 [GARCITY1] ZIL-2012	COS	REMOTE	RECEIVER VALVE #2012 LOCAL/REMOTE STATUS 6/11/05
6/11/05 15:06:54.9 [GARCITY1] HSO-2012.F_CV set to	1.000 by GARCITY1::		
15:06:54.9 [GARCITY1] HSO-2012			RECEIVER VALVE OPEN CMD 6/11/05
15:06:58.2 [GARCITY1] ZSO/C-2012	CFN	TRANSIT	RECEIVER VALVE POSITION 6/11/05
15:07:19.2 [GARCITY1] FIC8021S	HIHI		893 MMCF CONDENSER INLET FLOW PID SETPOINT 6/11/05
15:07:23.2 [GARCITY1] FIC8021S	OK		0 MMCF CONDENSER INLET FLOW PID SETPOINT 6/11/05
15:08:22.2 [GARCITY1] ZSO/C-2012	CFN	OPEN	RECEIVER VALVE POSITION 6/11/05
15:12:50.0 [GARCITY1] TAH-1121	OK	CLEAR	STABILIZER COLUMN BTMS HI TMP 6/11/05
15:13:06.0 [GARCITY1] TAH-1121	CFN	ALARM	STABILIZER COLUMN BTMS HI TMP 6/11/05
15:13:10.3 [GARCITY1] TAH-1121	OK	CLEAR	STABILIZER COLUMN BTMS HI TMP 6/11/05
15:21:13.9 [GARCITY1] MI-3030	HIHI		10 INLET GAS MOISTURE 6/11/05
15:27:44.0 [GARCITY1] TAL-1125	CFN	ALARM	STABILIZER COL FEED LOW TMP 6/11/05
15:28:32.5 [GARCITY1] TIC8031SP			450 DEGF REBOILER TEMP PID SETPOINT 6/11/05
6/11/05 15:28:32.5 [GARCITY1] TIC8031SP.F_CV set to	450.000 by GARCITY1::		
6/11/05 15:48:13.1 [GARCITY1] HSC-2010.F_CV set to	1.000 by GARCITY1::		
15:48:13.1 [GARCITY1] HSC-2010			MAINLINE VALVE CLOSE CMD 6/11/05
15:48:15.2 [GARCITY1] ZSO/C-2010	CFN	TRANSIT	RECIVER VALVE POSITION 6/11/05
15:49:49.2 [GARCITY1] ZSO/C-2010	CFN	CLOSE	RECIVER VALVE POSITION 6/11/05
15:50:29.1 [GARCITY1] PAL-2011	CFN	ALARM	LOW INCOMING LINE PRESSURE 6/11/05
15:51:17.2 [GARCITY1] ZSO/C-2011	CFN	TRANSIT	RECEIVER INLET VALVE POSITION 6/11/05
15:52:45.2 [GARCITY1] ZSO/C-2011	CFN	OPEN	RECEIVER INLET VALVE POSITION 6/11/05
15:52:51.2 [GARCITY1] ZIL-2011	COS	REMOTE	RECEIVER VALVE #2011 LOCAL/REMOTE STATUS 6/11/05
15:53:37.6 [GARCITY1] TAH-1121	CFN	ALARM	STABILIZER COLUMN BTMS HI TMP 6/11/05
6/11/05 16:01:53.0 [GARCITY1] HSO-2010.F_CV set to	1.000 by GARCITY1::		
16:01:53.0 [GARCITY1] HSO-2010			PIPELINE INLET VALVE OPEN CMD 6/11/05
16:01:59.2 [GARCITY1] ZSO/C-2010	CFN	TRANSIT	RECIVER VALVE POSITION 6/11/05
16:02:58.2 [GARCITY1] ZIL-2010	COS	LOCAL	RECEIVER VALVE #2010 LOCAL/REMOTE STATUS 6/11/05
16:02:58.2 [GARCITY1] ZSO/C-2010	CFN	CLOSE	RECIVER VALVE POSITION 6/11/05
16:03:02.2 [GARCITY1] ZSO/C-2010	CFN	TRANSIT	RECIVER VALVE POSITION 6/11/05
16:03:07.2 [GARCITY1] ZSO/C-2010	CFN	CLOSE	RECIVER VALVE POSITION 6/11/05
16:05:58.2 [GARCITY1] ZSO/C-2010	CFN	TRANSIT	RECIVER VALVE POSITION 6/11/05
16:06:04.3 [GARCITY1] ZSO/C-2010	CFN	CLOSE	RECIVER VALVE POSITION 6/11/05
16:07:44.2 [GARCITY1] ZSO/C-2010	CFN	TRANSIT	RECIVER VALVE POSITION 6/11/05
16:07:55.2 [GARCITY1] ZSO/C-0104	CFN	OPEN	UV-0104 NEPT INLET VALVE POSITION 6/11/05
16:12:39.2 [GARCITY1] ZSO/C-2010	CFN	OPEN	RECIVER VALVE POSITION 6/11/05
16:13:15.2 [GARCITY1] ZIL-2010	COS	REMOTE	RECEIVER VALVE #2010 LOCAL/REMOTE STATUS 6/11/05
16:16:00.2 [GARCITY1] FXI-3160	CFN	REM.	ACADIAN FLOW REMOTE/AUTO/MANUAL 6/11/05
6/11/05 16:16:21.1 [GARCITY1] HMCSU01.F_CV set to	1.000 by GARCITY1::		
16:16:21.1 [GARCITY1] HMCSU01			CSU RESET COMMAND 6/11/05
6/11/05 16:16:23.8 [GARCITY1] HMGC01.F_CV set to	1.000 by GARCITY1::		
16:16:23.8 [GARCITY1] HMGC01			STATION RESET COMMAND 6/11/05