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July 18, 2008



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

Re: CPF 4-2008-1010M

Dear Mr. Seeley:

Listed below are responses to the items addressed in your Notice of Amendment letter, dated June 20, 2008. As a result of the 2006 Integrity Management Federal inspection, Enbridge has instituted a complete revision of the written Integrity Management Plan, including a Company wide training program to reinforce the new IM plan, processes and procedures.

Enclosed with this letter is an electronic copy of the new 2008 IMP manual containing all elements of the plan. As allowed by the response notice, Enbridge requests that Appendix A & B of (SI-IMP-003) in the 2008 IMP manual which includes the Risk Algorithm and Data Requirements, is to be held as confidential to Enbridge. If required, Appendix A&B can be supplied under separate cover.

We respectfully submit the following written explanations in answer to the amendment items included in the Notice of Amendment as follows:

1. HCA identification – all issues have been addressed in the 2008 IMP manual with the exception of the Facilities' HCA identification process. Enbridge completed an HCA identification project in 2006 and made a conservative decision to include all above ground facilities or appurtenances within the HCA boundary. In addition a separate risk assessment was completed on the facilities, and we are currently

- conducting a more detailed evaluation of the piping within the fence boundaries of the facility to determine if an HCA is impacted.
2. Newly-identified areas – all issues have been addressed in the 2008 IMP manual.
 3. Methods – all issues have been addressed in the 2008 IMP manual.
 4. Threats - Enbridge defines "idle pipe" as pipe that has been taken out of service by purging with a blanket of nitrogen or other inert gas. We propose that our definition of "idle" pipe and the PHMSA definition of "out-of-service " pipe is the same. If our understanding of the definitions is incorrect, please advise.
 5. Risk minimization procedure – Advisory Bulletin ABD-04-01 is in the process of being added to our Hydrotest procedures as well as the Enbridge Safety and Health Manual.
 6. Threat identification – all issues have been addressed in the 2008 IMP manual.
 7. Data gathering and integration – Since 2006, Enbridge has conducted a Company wide effort to gather data for each pipeline system, including, but not limited to, past incident history, corrosion control records, physical pipe data, etc. We have also contracted Dynamic Risk Assessment Systems (DRAS) to utilize the IRAS software for risk assessment. In the case of missing data, the IRAS software defaults to a higher value in the scoring mechanism for a particular threat. With our continual evaluation plan, we will improve upon our process, consistently updating the data, and subsequently improving the risk assessment, therefore, this issue is addressed in the 2008 IMP manual.
 8. Risk assessment – all issues have been addressed in the 2008 IMP manual.
 9. ERW pipe- all issues have been addressed in the 2008 manual.
 - 10-17. ECDA/ICDA – at the time of the 2006 IMP audit, Enbridge acknowledges that the ECDA/ICDA plan was lacking in a detailed process or procedure, however, all issues have been addressed in the 2008 IMP manual.
 18. Discovery of conditions – the process for discovery of anomalous conditions is defined in the 2008 IMP manual. Enbridge is currently in the process of revising its ILI plan PI-100 to further clarify the requirements for discovery of anomalous conditions.
 19. Discovery of immediate repairs conditions – the process for classification of immediate conditions is defined in the 2008 manual. Enbridge is currently in the process of revising its ILI plan PI-104 to further clarify criteria for classification of immediate repair conditions.
 20. Recording and monitoring of "Monitored" conditions – all issues have been addressed in the 2008 IMP manual.
 21. Evaluation – all issues have been addressed in the 2008 IMP manual.
 - 22-23. Low Stress Assessments – all issues have been addressed in the 2008 IMP manual.

- 24-26. Reassessment Intervals – all issues have been addressed in the 2008 IMP manual.
27. Confirmatory Direct Assessment (CDA) – CDA is not currently in our assessment plans, however, if it becomes a method we would like to utilize, we will amend our IMP manual accordingly.
- 28-32. Preventive and mitigative measures - all issues have been addressed in the 2008 IMP manual.
33. Performance Measures – all issues have been addressed in the 2008 IMP manual.
34. Documentation – all issues have been addressed in the 2008 IMP manual.
35. Management of Change – all issues have been addressed in the 2008 IMP manual.
- 36-37. Quality Assurance – Enbridge believes that the intent of the rule is addressed in the current IMP; however we agree that additional documentation can be provided to more clearly and formally define how Enbridge will ensure the control and quality of integrity related services from outside contractors. Enbridge is currently in the process of revising the IMP Quality Assurance plan to provide additional detail.

Sincerely,



Allan Schneider
Vice President, Engineering and Operations

cc:

Kerry Puckett
Fred Whitted
Dan Larrington

Enclosure: Enbridge 2008 Integrity Management Plan CD