



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 S. Gessner, Suite 630
Houston, TX 77074

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 30, 2017

Mr. Graham Bacon
Group Senior Vice President, Operations & EHS&T
Enterprise Crude Pipeline, LLC
1100 Louisiana Street
Houston, TX 77002

4-2017-5008M

Dear Mr. Bacon:

Between March 4 and October 9, 2015, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Enterprise Crude Pipeline, LLC (Enterprise) procedures for constructing the Rancho Pipeline between Sealy, TX to Houston, TX.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within Enterprise's procedures, as described below:

1. §195.202 Compliance with specifications or standards.

Each pipeline system must be constructed in accordance with comprehensive written specifications or standards that are consistent with the requirements of this part.

The Enterprise Engineering and Specifications STD .8706 Bending and Alignment (Rev No. 0.1, June 2012), does not provide adequate requirements for performing field bends of spiral-weld seam pipe. Enterprise was found to be constructing the Rancho Pipeline using spiral seam pipe but the specifications for bending did not address this type of pipe. Enterprise's procedure provides detailed specifications for bending longitudinal-weld seam pipe but is silent on requirements for spiral-weld pipe actually being used to construct the Rancho pipeline.

Some of the specifications that must be addressed in the Enterprise's procedure include: position of bending shoes, whether the shoes can press on the spiral-weld seam, test bends, etc.... Enterprise must amend its procedure to meet the requirements in §195.202 with relation to its use of spiral-weld seam pipe.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Enterprise maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to R. M. Seeley, Director, Southwest, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **4-2017-5008M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*