

## NOTICE OF AMENDMENT

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 10, 2017

Mr. Graham Bacon  
Executive VP-Ops and Engineering  
Enterprise Products Partners, L.P.  
1100 Louisiana Street  
Houston, TX 77002

**CPF 4-2017-5020M**

Dear Mr. Graham Bacon:

From October 27, 2014 until November 20, 2015, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Enterprise Products - Mid-America Pipeline Company (EP\_MAPCO) procedures for O&M, Emergency, Corrosion Control, Public Awareness, Integrity Management, and Training & Qualifications in Houston, TX.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within EP\_MAPCO's plans or procedures, as described below:

1. **§195.402 Procedural manual for operations, maintenance, and emergencies.**
  - (a) **General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

EP\_MAPCO fails to have a procedure or procedures that deal with In-service Welding regarding the following: pipe wall burn through, weld cooling rate, hydrogen cracking, metallurgy of the materials being welded, proper support of the pipe in the ditch, and delay times prior to inspection of the weld. The Federal Regulations, §195.422(a) states,

*“Each operator shall, in repairing its pipeline systems, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property.”*

The EP\_MAPCO Engineering Standards and Specifications, *STD.8004 In-service Welding, Pre-assessment, Evaluation, and Approval*, is a form with instructions for completing the Pre-Assessment Letter (PAL). The standard fails to address pipe wall burn through, weld cooling rate, hydrogen cracking, metallurgy of the materials being welded, proper support of the pipe in the ditch, and delay times prior to inspection of the weld. The standard does reference API 1104 Appendix B In-Service Welding, but fails to elaborate on the processes.

EP\_MAPCO must amend their procedures to address pipe wall burn through, weld cooling rate, hydrogen cracking, metallurgy of the materials being welded, proper support of the pipe in the ditch, and delay times prior to inspection of the weld.

#### Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. 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 an Order Directing Amendment. If 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. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 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 Products - Mid-America Pipeline Company maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Terri J. Binns, Acting Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2017-5020M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Terri J. Binns  
Acting Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration

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