

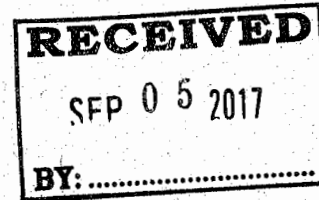


August 25, 2017

Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
8701 South Gessner, Suite 630  
Houston, Texas 77074

Attn: Mr. Frank Causey  
Acting Director, Southwest Region, PHMSA

Re: CPF 4-2017-5025M  
Notice of Amendment  
Enterprise Crude Pipeline LLC ("Enterprise")



Dear Mr. Causey,

Enterprise is in receipt of the above referenced "Notice of Amendment" dated June 20, 2017 and received June 26, 2017 and PHMSA's subsequent letter granting Enterprise a response time extension to August 25, 2017. This letter constitutes Enterprise's timely response to the subject NOA.

Enterprise is committed to ensuring our Engineering Standards & Specifications are technically accurate and effective for their intended use. As such, periodic reviews and revisions, if applicable, are conducted as part of a continuous improvement program. Accordingly, STD.4600, *Pipeline Design for Onshore Pipelines*, and STD. 9013, *High Consequence Area Identification and Emergency Flow Restricting Device Analysis for New Construction of Hazardous Liquid Pipelines*, has been revised to address the item identified by PHMSA and provide general clarity.

**Item 1:**

**§195.260 Valves: Location.**

***A valve must be installed at each of the following locations:***

- (a) On the suction end and the discharge end of a pump station in a manner that permits isolation of the pump station equipment in the event of an emergency.***
- (b) On each line entering or leaving a breakout storage tank area in a manner that permits isolation of the tank area from other facilities.***
- (c) On each mainline at locations along the pipeline system that will minimize damage or pollution from accidental hazardous liquid discharge, as appropriate for the terrain in open country, for offshore areas, or for populated areas.***
- (d) On each lateral takeoff from a trunk line in a manner that permits shutting off the lateral without interrupting the flow in the trunk line.***
- (e) On each side of a water crossing that is more than 100 feet (30 meters) wide from high-water mark to high-water mark unless the Administrator finds in a particular case that valves are not justified.***
- (f) On each side of a reservoir holding water for human consumption.***

**§195.452 Pipeline integrity management in high consequence areas.**

**(i) What preventive and mitigative measures must an operator take to protect the high consequence area?**

**(4) Emergency Flow Restricting Devices (EFRD). If an operator determines that an EFRD is needed on a pipeline segment to protect a high consequence area in the event of a hazardous liquid pipeline release, an operator must install the EFRD. In making this determination, an operator must, at least, consider the following factors—the swiftness of leak detection and pipeline shutdown capabilities, the type of commodity carried, the rate of potential leakage, the volume that can be released, topography or pipeline profile, the potential for ignition, proximity to power sources, location of nearest response personnel, specific terrain between the pipeline segment and the high consequence area, and benefits expected by reducing the spill size.**

*At the time of the inspection visit, the operator's procedures (STD. 4600) failed to include adequate procedures for how the operator determined valve placements at the locations specifically identified in the regulation, as well as the installation of EFRDs required in HCAs per integrity management regulations, but simply referenced the code portion, § 195.260, without sufficient detail in its Pipeline Design for Onshore Pipelines' Section for Mainline Block Valves 8.7.2, which merely stated,*

*"(4) For liquid pipelines, mainline block valve location shall comply with the following requirements:*

*a. 49 CFR 195.260 for regulated liquid pipelines"*

*The operator must revise their procedures to specifically detail those areas requiring valves to be located per regulatory requirements, as well as determined by their HCA analyses per their IM plans.*

**Enterprise Response to Item 1:**

Enterprise has revised STD.4600. Section 8.7, Valves is now Section 9.7, Valves and has been amended to incorporate and clarify the requirements of §195.260. Additionally, paragraph 3 of Section 9.7.2, Mainline Block Valves has been amended to reference STD.9013. An excerpt containing Section 9.7 of Standard STD.4600 is attached.

Finally, Section 5.0 of STD.9013 has been added to specify the applicability and considerations for EFRD analysis as per §195.452(i)(4). An excerpt containing Section 5.0 of Standard STD.9013 is attached.

Enterprise welcomes the opportunity to work with PHMSA regarding the safe construction and operation of our pipelines. 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.

Sincerely,



Graham Bacon  
Executive Vice President, Operations & Engineering

**Attachments:**

- STD.4600, Pipeline Design for Onshore Pipelines (Excerpt)
- STD.9013, High Consequence Area Identification and Emergency Flow Restricting Device Analysis for New Construction of Hazardous Liquid Pipelines (Excerpt)