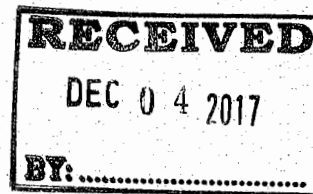




November 30, 2017

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



Attn: Terri J. Binns
Acting Director, Southwest Region, PHMSA

Re: CPF 4-2017-5034W
Warning Letter
Enterprise Crude Pipeline, LLC ("Enterprise")

Dear Ms. Terri J. Binns,

Enterprise is in receipt of the above referenced "Warning Letter" dated October 27, 2017, received October 31, 2017. Enterprise shares PHMSA's commitment to pipeline safety and takes allegations of noncompliance with the pipeline safety rules seriously. Warning Letters are enforcement actions by PHMSA, which become part of an operator's record and prior enforcement history. For that reason, and although no response to a Warning Letter is required under PHMSA 49 C.F.R. Part 190 rules, Enterprise is providing this response to clarify the relevant facts and applicable law. Specifically, Enterprise requests that PHMSA withdraw the Warning Item because they are based on a misapplication of the fact.

Warning Letter Item 1:

§195.402(a) Procedural manual for operations, maintenance, and emergencies

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

13) Periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

Enterprise Products failed to document the names of personnel being periodically reviewed conducting maintenance and normal operations. Periodic reviews of maintenance and normal operations work done by operator personnel are documented on Enterprise Form 601A. However, the electronic documents did not list the name of the personnel being reviewed. The electronic version of Enterprise Form 601A lists the name of the Enterprise employee who inspected the work, and the employee who closed out the work order, but does not identify the operator personnel who performed the work reviewed.

Enterprise Response to Warning Letter Item 1:

Enterprise believes the concern noted was simply a misunderstanding of Enterprise's requirements when completing the form and does not translate to a deficiency or violation of PHMSA rules or Enterprise procedures. O&M Procedure L0601, Manual Review and Periodic Review of Work, (O&M L0601) states that, Operations will ensure that a periodic review is conducted for work done by operating personnel to determine the effectiveness and adequacy of those procedures within this manual utilized for normal operations, maintenance activities and abnormal operating conditions.

As such, Enterprise did not fail to follow our procedures.

Should you have any questions, require additional information or wish to discuss this matter in greater detail, please do not hesitate to contact our office. Enterprise welcomes the opportunity to work with PHMSA regarding the safe operation of our pipelines.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Morton", with a long horizontal line extending to the right.

Jeff Morton
Senior Director, Transportation Compliance