



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**

December 30, 2019

Paul Brewer  
Executive Vice President of Operations  
Enable Midstream Partners  
499 W. Sheridan, Ste 1500  
Oklahoma City, Oklahoma 73102

**CPF 4-2019-1014M**

Dear Mr. Brewer:

From June 3, 2019 to September 27, 2019, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Enable Gas Transmission (Enable) procedures for Operations and Maintenance, Control Room Management, and Integrity Management in Oklahoma City, Oklahoma. Enable Midstream Partners operate under the Enable Gas Transmission procedures.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Enable's plans or procedures, as described below:

**1. §192.631 Control room management.**

**(a) General.**

**(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section, except that for each control room where an operator's activities are limited to either or both of:**

**(i) Distribution with less than 250,000 services, or**

**(ii) Transmission without a compressor station, the operator must have and follow written procedures that implement only paragraphs (d) (regarding fatigue), (i) (regarding compliance validation), and (j) (regarding compliance and deviations) of this section.**

Enable's Control Room Management Program, Chapter CR-001, Section 5.0: Deviations, was found to be inadequate and must be amended to provide adequate guidance on documentation to demonstrate that any deviation from the procedures required by §192.631(j)(2). Enable's procedure did not include a time frame of when deviations should be documented after the deviation occurred.

PHMSA inspectors reviewed five GT8259: Deviation from Procedure forms. The deviations occurred in January 2018, March 2018, and April 2018, but documentation was not completed until July 2019. The procedure should include specific guidance on when documentation should be completed after a deviation from the Control Room Management Program has occurred.

**2. §192.911 What are the elements of an integrity management program?**

**(k) A management of change process as outlined in ASME/ASNI B31.8S, section 11.**

Enable's Integrity Management Program Manual, PS-165: Management of Change Procedure and MC-100: Management of Change Procedure were found to be inadequate and must be amended to include a management of change process as outlined in ASME B31.8S, Section 11. Enable's procedures do not include all required elements of a management of change (MOC) process: reason for change, authority for approving changes, analysis of implications, acquisition of required work permits, documentation, communication of change to affected parties, time limitations, and qualification of staff. The MOC shall address technical, physical, procedural, and organizational changes to the system, whether permanent or temporary. Enable's procedure should incorporate planning for each of these situations and consider the unique circumstances of each.

**Response to this Notice**

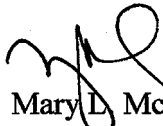
This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit 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 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 Enable Gas Transmission maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Mary L. McDaniel, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to CPF 4-2019-1014M and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



Mary L. McDaniel, P.E.  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration

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