



Pipeline Safety  
Enable Midstream Partners  
499 W. Sheridan  
Suite 1500 M/760  
Oklahoma City, OK 73102

January 30, 2020

Mary McDaniel  
Director, Southwest Region  
PHMSA Pipeline Safety  
8701 S. Gessner Dr.  
Suite 1110  
Houston, TX 77074

**Subject: Enable Gas Transmission, LLC - Response to PHMSA Notice of Amendment CPF 4-2019-1014M**

Dear Ms. McDaniel,

This letter, along with attachments, constitutes the response of Enable Gas Transmission, LLC (EGT) to the Notice of Amendment issued by Pipeline and Hazardous Materials Safety Administration (PHMSA) on December 30, 2019. On the basis of PHMSA's inspection performed from June 3, 2019 to September 27, 2019, two apparent inadequacies were identified, one within Enable's Control Room Management Plan and one related to the Integrity Management Plan.

**Item 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.*

**Item 1 - Resolution:**

Enable's System Control Manual, CR-001 Control Room Management Program document, CR-232 System Control Fatigue Management procedure, GT8259 Deviation from Procedure – Hours of Service form and GT8328 Deviation from Procedure form have been revised to include and specify the timeframe within which a deviation must be documented after the occurrence of a deviation and deviation signature requirements. These revised documents and forms are attached for review as exhibits.



**Item 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 831.8S, 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.*

**Item 2 - Resolution:**

Enable agrees that the elements of ASME/ANSI B31.8S, Section 11 should be formally organized and documented within the Company's MOC procedures. Enable requests a 365-day extension to resolve this NOA. During this time, Enable will develop and implement a more comprehensive MOC Program and revise associated procedures used to manage changes associated with 49 CFR Part 192, Subpart O to meet the requirements of ASME B31.8S, Section 11. This effort will require an extensive procedural and process review and stakeholder engagement to ensure these changes are managed safely, effectively, and in compliance with ASME B31.8S, Section 11.

Also, due to the integration of the new and/or changed gas and liquid regulatory requirements effective July 1, 2020, the additional time will help ensure the new regulatory changes are included in the resolution of this NOA.

Through the actions specified in this letter, we believe Enable has fulfilled the requirements of Item 1 of this Notice of Amendment and provided a plan to resolve Item 2. If you have any questions concerning the information contained in this response, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cary D. Watson", with a stylized flourish at the end.

Cary Watson  
Vice President, Safety, Environmental and Technical Programs  
Enable Midstream Partners, LP

**Attachments/Exhibits:**

1. CR-001 Control Room Management Program
2. CR-232 System Control Fatigue Management
3. Form GT8259, Deviation from Procedure (HOS)
4. Form GT8328, Deviation from Procedure