



Alison E. Barry
Assistant General Counsel

DCP Midstream
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January 8, 2020

Ms. Mary McDaniel
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner Road
Suite 900
Houston, TX 77074

**RE: Dauphin Island Gathering Partnership Response
Notice of Probable Violation
CPF 4-2019-2003**

Dear Ms. McDaniel,

From May 14th, 2019 to June 13, 2019, representatives from the Pipeline Hazardous Material Safety Administration (PHMSA), Office of Pipeline Safety ("OPS") inspected the Dauphin Island Gathering Partnership ("DIGP") offshore pipeline system located in the Gulf of Mexico and Mobile, Alabama. DIGP is a wholly owned subsidiary of DCP Midstream, LP ("DCP"), which is the operator of record. Pursuant to a 1998 services agreement between DIGP and Duke Energy Operating Company ("DEOC"), Enbridge, Inc. ("Enbridge"), the successor in interest to DEOC, operates the DIGP pipeline system on behalf of DCP.

On December 12, 2019, PHMSA issued the above reference Notice of Probable Violation and Proposed Compliance Order alleging a violation of the pipeline safety regulations. The following is a brief summary of PHMSA's findings and DCP's response.

PHMSA Finding

1. §192.615 Emergency Plans.

Enbridge failed to conduct an emergency response training in calendar year 2018 for its Opelousas Area personnel who operate the DIGP system. Enbridge's Standard Operating Procedure (SOP) 5-2010 requires that such training be provided within certain time limits, as follows:

Enbridge SOP 5-2010, Section 7.2, revision date 01/05/2019 states, "An Emergency Response Plan training session with area personnel shall be conducted once each calendar year, but not to exceed fifteen (15) months. Area personnel are responsible to review the Area Emergency Response Plan. The review is to be documented on Form #7T-9."

Enbridge could not verify that an emergency response plan training session for Opelousas Area personnel for calendar year 2018 was conducted. During the inspection, the PHMSA inspector reviewed Form #7T-9 and found that emergency response training was performed on December 1, 2016, December 3, 2016, and December 7, 2017.

Enbridge stated that the emergency response training was not scheduled for Opelousas field personnel during the calendar year 2018, due to personnel and other organizational changes resulting from the 2018 merger between Enbridge and Spectra Energy, Inc., which previously provided the DIGP operating services.

DCP Response

Enbridge has acknowledged that the emergency response training for its Opelousas Area personnel was not performed in calendar year 2018.

Enbridge has since made changes to Enbridge's SAP Work Order management system to ensure the appropriate field personnel receive a Work Order to perform the emergency response training for the DIGP system within the required interval.

As required by PHMSA in the proposed Compliance Order, Enbridge conducted emergency response training for this area on December 10 and December 12, 2019. Copies of the attendance records from both dates are attached to this correspondence. DCP requests that the final Compliance Order be revised to acknowledge that this requirement has been completed, so as not to inadvertently require the training to be repeated until the next regularly scheduled date.

Please call me at (303) 605-1753 if you need additional information.

Sincerely,



Alison E. Barry

Enclosure

cc: John Pontious
Nathan Atanu



Attendance Record

BUSINESS UNIT 1076	REGION Houma	AREA Houma	LOCATION MP 225
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NOTE: * Must be recorded.

COURSE TITLE* Emergency response	COURSE INSTRUCTOR* Jerome Snyder	COURSE NUMBER*	DATE* 12/12/19
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NAME (Please Print - Last Name First)	EMPLOYEE NUMBER	EMPLOYEE RESPONSIBILITY CENTER	ASSIGNED WORK LOCATION (If Contractor, Name of Contractor)	ATTENDEE'S INITIALS
1. SEVIN, PAUL	210327		OFFSHORE DLGP	AS
2. Guichry, Stacy	401701		MP 225A	SG
3. GARCIA, JAMES			MP 225A	JS
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Course Description (i.e., specific requirements met by training)
 Review Enbrdge emergency response manual.

We, at Spectra Energy, certify that the above employees have been trained and tested in accordance to 49 CFR 172.704 and ICAO Regulation.

DISTRIBUTION:

Original - Transmission - Location File
 Engineering - Houston Technical Services File

RETENTION:

Original - As required



Attendance Record

BUSINESS UNIT 1076	REGION Houma	AREA Houma	LOCATION Houma
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NOTE: * Must be recorded.

COURSE TITLE* Emergency reponse	COURSE INSTRUCTOR* Jerome Snyder	COURSE NUMBER* 255506	DATE* 12/10/19
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NAME (Please Print - Last Name First)	EMPLOYEE NUMBER	EMPLOYEE RESPONSIBILITY CENTER	ASSIGNED WORK LOCATION (If Contractor, Name of Contractor)	ATTENDEE'S INITIALS
1. Snyder, Jerome	202094	2111	Houma	JMS
2. BUBRIG, JOEY	255506		GBPL/NATALLUS	JB
3. Arabie Paul	611414	2111	Houma, La	PA
4. Carla Theriot	255505		Houma, La	CTT
5. Stanley Poirmeau	255531		SS 207	SP
6. Brad Adams	613624	2111	Houma	BA
7. PASCAL BARONE	215780	2111	VENICE	PB
8. Cathy, Brown	260418		Houma, LA	CB
9. COZIE HALL	276209		Houma, LA	CH
10. Jacob Fontenot	261697		Houma, LA	JF
11. Brady L. Augustine	258427		Houma, LA	B.L.A.
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Course Description (i.e., specific requirements met by training)
 Emergency reponse review

We, at Spectra Energy, certify that the above employees have been trained and tested in accordance to 49 CFR 172.704 and ICAO Regulation.

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RETENTION:

Original - As required