

NOTICE OF AMENDMENT

ELECTRONIC MAIL - RETURN RECEIPT REQUESTED

November 3, 2020

Cary Watson
Vice President
Safety, Environmental & Technical Programs
Enable Gas Transmission, LLC
499 West Sheridan Avenue, Suite 1500
Oklahoma City, Oklahoma 73102

CPF 4-2020-001-NOA

Dear Mr. Watson:

From March 2, 2020 through March 5, 2020, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Enable Gas Transmission, LLC's (Enable) Control Room Management Program and records in Houston, Texas.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Enable's written 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: . . .

(b) *Roles and responsibilities.* Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1) A controller's authority and responsibility to make decisions and take actions during normal operations;

Enable's written Control Room Management Procedure, *System Control: Roles and Responsibilities* (CR-242) version 6.0 dated April 23, 2020, does not define the roles and responsibilities of the on-call controller monitoring its pipeline, and does not define the extreme circumstances in which the on-call controller may log in to its SCADA remotely until a replacement controller arrives at the control room.

Enable's written procedure, Section 4.1.1.18 *Additional responsibilities during normal operations*, allows its on-call controllers to "monitor the system remotely until a replacement can arrive." However, Enable's written procedure neither defines the roles and responsibilities of the on-call remote controller nor defines what constitutes extreme circumstances.

Additionally, Section 4.2.1.13.b of CR-242 allows for its System Control Director, Manager and Supervisor of System Control (Manager) to "monitor" the system in "extreme circumstances" when a System Controller can no longer control Enable's pipeline on its assigned control room console until a replacement System Controller arrives in the Control room. However, Enable's procedures do not define the required qualifications of its Manager or whether the Manager must be qualified as a System Controller in order to monitor the pipelines.

Therefore, Enable must amend its written procedures to: (1) define the roles and responsibilities of the on-call controller and the extreme circumstances when the on-call controller may log in remotely to Enable's SCADA until a replacement controller arrives to the control room; and (2) define the required qualifications of its Manager or whether the Manager must be qualified as a System Controller.

2. § 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: . . .

(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following: . . .

(1) . . .

(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays;

Enable's written Control Room Management Procedure, *System Control: Point-to-Point Verification* (CR-200) version 4, dated April 23, 2020, was inadequate because it did not require its personnel to verify alarm limits and set points as part of its point-to-point process if "System Control has operational concerns with doing so."

Section 192.631(c)(2) requires the verification of point-to-point between SCADA displays and related field equipment. However, CR-200 permits the temporary delay of a point-to-point verification due to operational concerns with no indication of when Enable personnel would eventually perform the required verification. Therefore, Enable must amend its procedures to ensure that Enable personnel verify alarm limits and set points as part of the point-to-point process.

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, LLC 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, P.E., Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to CPF 4-2020-001-NOA 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