



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

November 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 Probable Violation and Proposed Compliance Order CPF 4-2020-002**

Dear Ms. McDaniel,

This letter constitutes the response of Enable Gas Transmission, LLC (EGT) to the PHMSA Notice of Probable Violation and Proposed Compliance Order, CPF 4-2020-002, issued by Pipeline and Hazardous Materials Safety Administration (PHMSA) on November 3, 2020, on the basis of PHMSA's Control Room Management inspection performed from March 2, 2020 through March 5, 2020. EGT acknowledges the findings identified and does not contest the corrective actions specified.

**CPF 4-2020-002-NOPV**

Item 1

*§ 192.631 Control room management.*

*(a) ...*

- (f) Change management. Each operator must assure that changes that could affect control room operations are coordinated with the control room personnel by performing each of the following:*
- (1) Establish communications between control room representatives, operator's management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration;*
  - (2) Require its field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations; and*
  - (3) Seek control room or control room management participation in planning prior to implementation of significant pipeline hydraulic or configuration changes.*

*With respect to item 1, PHMSA proposes to issue a Compliance Order.*

**Proposed Compliance Order**

- A. In regard to Item Number 1 of the [NOPV] pertaining to the failure of field personnel in contacting the control room when making field changes that affect the control room operations, Enable Gas Transmission, LLC must:*
- 1. Review all of its operating and maintenance procedures to identify which*



*procedures have tasks with field changes that could affect control room operations, but currently do not require its field personnel to contact the control room before or after any field changes are made; and*

- 2. Follow its Management of Change process and amend the inadequate procedures identified as a result of the review in Item A.1 of the Compliance Order to ensure the procedures require that field personnel contact the control room when making field changes that affect control room operations*

*B. In regard to Item Number 1 [of the NOPV], Enable Gas Transmission, LLC must submit to Director, Southwest Region, Office of Pipeline Safety, PHMSA, documentation of the review conducted under Item A.1 of the Compliance Order and the ... amended procedures under Item A.1 of the Compliance Order within 90 days of receipt of the Final Order.*

EGT is now reviewing all of its operating and maintenance procedures and will follow the management of change process to make any necessary changes to remediate the alleged probable violations. 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 that reads "Cary D. Watson". The signature is fluid and cursive, with a long horizontal stroke at the end.

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