



Pipeline Safety  
Enable Midstream Partners  
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Oklahoma City, OK 73102

February 25, 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 NOPV CPF 4-2020-1004**

Dear Ms. McDaniel,

In response to PHMSA NOPV CPF 4-2020-1014, Enable Gas Transmission (Enable) does not contest the findings identified by the Pipeline and Hazardous Materials Administration (PHMSA) Inspectors during the June 3, 2019 to September 27, 2019 inspection of Enable's assets. Enable does intend to take the actions in the proposed compliance order or alternate methods of remediation that meet or exceed the perceived intent.

Item 2. § **192.481 Atmospheric corrosion control: Monitoring.**

***(b) During inspections, the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.***

*Enable failed to adequately give particular attention to pipe in spans over water when conducting atmospheric corrosion inspections. PHMSA reviewed the Enid Unit atmospheric corrosion inspection records and found that in two locations, Enable used binoculars to perform its atmospheric corrosion inspections for the pipelines that span over water. Particular attention must be paid to the entire pipe segment spanning over water, specifically where the pipe segment is in contact with pipe supports and bridge housings. These areas may not be visible from a distance using binoculars, preventing adequate atmospheric corrosion inspections. On Line 23-24, which spans the Arkansas River Bridge, the description of work states that the pipeline was inspected via binoculars and rain holes in the bridge. On Line 25, which is under the Walnut River Bridge, the description of work states that the pipeline was inspected with binoculars.*

*Corrective Action Order:*

*In regard to Item Number 2 of the Notice pertaining to conducting atmospheric corrosion inspections on pipelines that span rivers and are located underneath bridges, Enable must amend its procedure to include detailed guidance on conducting atmospheric corrosion inspections for pipelines that span over water and are located under bridges. Procedures must be sent to Mary L. McDaniel, Director, Southwest*

*Region for review and approval. After the Director has approved the procedure as adequate, Enable must then conduct atmospheric corrosion inspections for pipelines that span over water and under bridges, and provide PHMSA those inspection records, including pictures that document the condition of the pipeline in those areas. Items 2 of the Notice is to be accomplished within 30 days following receipt of the Final Order.*

Item 2. Resolution: Enable has revised its CC-280 "Atmospheric Corrosion Inspection and Control" procedure to specify the acceptable methods to be utilized for atmospheric corrosion inspections on pipelines that span rivers and are located underneath bridges. The procedure is included as an exhibit for PHMSA's review and approval prior to implementation and proceeding with inspections of the Line 23-24 Arkansas River Bridge span and the Line 25 Walnut River Bridge span.

Enable requests an extension of 365-days to allow enough time to evaluate the entire regulated pipeline system to ensure all pipelines that span over water and are located under bridges are identified. The procedure revisions and adjustments needed to address this issue are completed but awaiting PHMSA's review and approval. Due to the safety issues of alternate visual inspections, such as the use of bucket trucks and manlifts, additional programs and procedures other than CC-280 may need to be revised and/or created. Lastly, implementation of the new or revised procedures, training for those procedures and physical inspection of such pipelines will exceed the 30-day allotment of time following receipt of the Final Order.

Item 3. § 192.705 *Transmission lines:Patrolling.*

***(a) Each operator shall have a patrol program to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.***

*Enable failed to ensure that its right of way (ROW) conditions were acceptable for the type of patrolling used to observe surface conditions on and adjacent to the transmission line ROW for indications of leaks, construction activity, and other factors affecting safety and operation. Enable has implemented the Vegetation Management Program, which is a spraying program that controls vegetation on the ROW. PHMSA observed five Enable unit locations where the ROW conditions appeared to be unacceptable due to the amount of vegetation on the ROW.*

*The following locations at each unit were observed to have ROW conditions that did not provide for adequate observation of the ROW:*

- *Ada Unit: Stringtown Railroad Crossing;*
- *AR-2 Russellville: Tates Island ROW outside the station gate, HCA HS 1252 Walmart in Morrilton, Mooreland Compressor Station ROW outside the station gate on the suction side;*
- *AR MO Fort Smith: Cossatot East ROW, Winslow Station ROW, HCA HS 1247 Commercial Building ROW, HCA HS 1246 Sonic, Assisted Living, Apartments ROW;*
- *Enid: HCA on Line 4-1-4 at TS 2142 at W Chestnut Ave and the Tuscana*

- Apartments, Line 2-H-9 at W Pine NI 2740 Rd ROW; and*
- *AR-5 Dunn: Highway 309 ROW for Lines BT-1/BT-I-AN, Paint Rock Road, Mt. Cannel Road Crossing.*

*In regard to Item Number 3 of the Notice pertaining to right-of-way (ROW) conditions, Enable must ensure that its ROW conditions are accessible for walking patrols to observe surface conditions for leaks, construction activity, and other factors affecting safety and operation of the pipeline. Enable has developed and implemented its Vegetation Management Program to maintain ROW conditions. Enable must provide PHMSA with a list of jurisdictional pipelines where the Vegetation Management Program has been implemented and a list of jurisdictional pipelines where the program has not yet been implemented and the implementation dates. Enable must also provide PHMSA with a detailed plan of adjustments made to patrolling procedures in areas of high vegetation until the Vegetation Management Program has become effective in those areas.*

*Items 3 of the Notice are to be accomplished within 90 days following receipt of the Final Order.*

Item 3. Resolution: Enable invested an additional \$1.5M, in the 4<sup>th</sup> quarter 2019, to address the identified locations above and those rights-of-way determined to need improvement across the system. All locations identified in this Compliance Order have been mowed. These locations have line-of-sight pipeline markers.

Enable's patrolling procedure will not be adjusted, as right-of-way conditions must be maintained in a condition that allows personnel to traverse them and perform the Operations and Maintenance requirements mandated by § 192.705 Transmission Lines: Patrolling.

Enable's Integrated Vegetation Management Program (IVM) continues to mature. The following Program changes are in-progress:

- Herbicide blends/mixes are being changed to a pasture mix for Class III & HCA areas.
- QA/QC process is being implemented through Davey Resource Group (DRG), environmental experts.
- Mowing plan adjustments will be based on DRG inputs and Operations Team feedback.
- The IVM is being revised to further develop Program roles/responsibilities.
- Enable is establishing an IVM implementation committee.

The PHMSA requested lists of jurisdictional pipelines where Enable's IVM Program has been implemented, a list of jurisdictional pipelines where the program has not yet been implemented and implementation dates for the same are included as Exhibits 2. and 3.

Item 5. § 192.745 Valve maintenance: Transmission lines.

***a. Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.***

*Enable failed to ensure that each transmission line valve that might be required during any emergency is inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year. On July 22, 2019, PHMSA reviewed the Pipeline Block Valve Inspection records for Sayre and Arapaho Unit in the Wheeler*



*Operations Area and found that BV 34174 had not been operated since March 6, 2018, exceeding the 15-month requirement by 16 months, 17 days.*

*In regard to Item Number 5 of the Notice pertaining to inspection and partial operation of transmission line valves that might be required during any emergency, Enable must conduct a complete valve inspection on BV 34174 and provide PHMSA with those inspection records. Enable must also provide PHMSA with pictures of the valve and the surrounding containment area.*

*Items 5 of the Notice is to be accomplished within 30 days following receipt of the Final Order.*

Item 5. Resolution: BV 34174 is an inactive receipt point tap valve. BV34174 has been inspected and operated. This tap valve was then blinded off. Adjoining piping has been disconnected and abandoned. Photos of this location and the valve box are included as exhibits, as well as the requested Maximo Valve Maintenance documentation.

Through the actions specified in this letter, we believe Enable has fulfilled the Compliance Order requirements for Items 3. and 5. Once PHMSA approves the Item 2. procedure revisions, Enable will take immediate action to perform the atmospheric corrosion inspections included in this Compliance Order but asks for a reasonable time extension, as requested above, to identify and evaluate any other such span crossings. If you have any questions concerning the information contained in this response, please do not hesitate to contact me.

Sincerely,

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

Attachments/Exhibits:

1. Item 2. - Revised CC-280 "Atmospheric Corrosion Inspection and Control" procedure
2. Item 3. - 2020 Northern Division IVM List (Vegetation Management)
3. Item 3. - 2020 Southern Division IVM List (Vegetation Management)
4. Item 5. - PHOTO 1 BV34174 Location at Line ADT-12 Prior to Removal of Pipe
5. Item 5. - PHOTO 2 BV34174 ADT-12 Prior to Disconnecting Pipe
6. Item 5. - PHOTO 3 BV34174 Line ADT-12 with Blind Flange
7. Item 5. - PHOTO 4 BV34174 Valve Site Piping Removed
8. Item 5. - Maximo Workorder BV34174 Valve Maintenance (Valve Maintenance documentation)