



Pipeline Safety
Enable Midstream Partners
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November 12, 2021

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 4-2021-047

Dear Ms. McDaniel,

Without waiving its right to request a hearing, Enable Gas Transmission, LLC (EGT) hereby submits the following written comments in response to the Pipeline and Hazardous Materials Safety Administration (PHMSA) Notice of Probable Violation and Proposed Compliance Order, CPF 4-2021-047, issued on October 21, 2021, on the basis of PHMSA's incident investigation following a natural gas release on EGT's 16-inch Line A-South in Caddo Parish, Louisiana. An alleged violation was identified, and a Compliance Order proposed. Below is the excerpt from Notice of Probable Violation CPF 4-2021-047.

§ 192.619 - Maximum allowable operating pressure: Steel or plastic pipelines.

(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure determined under paragraph (c), (d), or (e) of this section, or the lowest of the following:

(1) The design pressure of the weakest element in the segment, determined in accordance with subparts C and D of this part. However, for steel pipe in pipelines being converted under § 192.14 or uprated under subpart K of this part, if any variable necessary to determine the design pressure under the design formula (§ 192.105) is unknown, one of the following pressures is to be used as design pressure:

- (i) Eighty percent of the first test pressure that produces yield under section NS of Appendix N of ASME B31.8 (incorporated by reference, see § 192.7), reduced by the appropriate factor in paragraph (a)(2)(ii) of this section; or***
- (ii) If the pipe is 12 3/4 inches (324 mm) or less in outside diameter and is not tested to yield under this paragraph, 200 p.s.i. (1379 kPa).***

(2) The pressure obtained by dividing the pressure to which the pipeline segment was tested after construction as follows:

- (i) For plastic pipe in all locations, the test pressure is divided by a factor of 1.5.***
- (ii) For steel pipe operated at 100 psi (689 kPa) gage or more, the test pressure is divided by a factor determined in accordance with the Table 1 to paragraph (a)(2)(ii):***

TABLE 1 TO PARAGRAPH (a)(2)(ii)

Class location	Installed before (Nov. 12, 1970)	Factors, ^{1 2} segment -		
		Installed after (Nov. 11, 1970) and before July 1, 2020	Installed on or after July 1, 2020	Converted under §192.14
1	1.1	1.1	1.25	1.25
2	1.25	1.25	1.25	1.25
3	1.4	1.5	1.5	1.5
4	1.4	1.5	1.5	1.5

¹ For offshore pipeline segments installed, uprated or converted after July 31, 1977, that are not located on an offshore platform, the factor is 1.25. For pipeline segments installed, uprated or converted after July 31, 1977, that are located on an offshore platform or on a platform in inland navigable waters, including a pipe riser, the factor is 1.5.

² For a component with a design pressure established in accordance with § 192.153(a) or (b) installed after July 14, 2004, the factor is 1.3.

(3) The highest actual operating pressure to which the segment was subjected during the 5 years preceding the applicable date in the second column. This pressure restriction applies unless the segment was tested according to the requirements in paragraph (a)(2) of this section after the applicable date in the third column or the segment was uprated according to the requirements in subpart K of this part:

Pipeline segment	Pressure date	Test date
-Onshore gathering line that first became subject to this part (other than § 192.612) after April 13, 2006. -Onshore transmission line that was a gathering line not subject to this part before March 15, 2006.	March 15, 2006, or date line becomes subject to this part, whichever is later.	5 years preceding applicable date in second column.
Offshore gathering lines.	July 1, 1976	July 1, 1971.
All other pipelines.	July 1, 1970	July 1, 1965

(4) The pressure determined by the operator to be the maximum safe pressure after considering and accounting for records of material properties, including material properties verified in accordance with § 192.607, if applicable, and the history of the pipeline segment, including known corrosion and actual operating pressure.



Enable failed to establish a Maximum Allowable Operating Pressure (MAOP) for its 16-inch Line A-South pipeline in accordance with § 192.619(a). Enable was unable to provide records demonstrating the establishment of the MAOP for its pipeline, which was in service prior to 1970.

During the inspection, Enable could not produce pressure test records, logs, or highest actual operating pressure for the five-year period preceding July 1, 1970, to establish its MAOP. Instead, Enable offered Fitness for Service – Interstate Natural Gas Association of America (INGAA) bulletins to support its MAOP establishment in 2012 using an MAOP Validation Safe Operating History form with data from calendar years 2012, 2013, and 2014. However, Enable’s records do not meet the requirements of § 192.619(a) for establishing the MAOP of its 16-inch Line A-South pipeline.

Enable disagrees with PHMSA’s statement that “Enable’s records do not meet the requirements of §192.619(a)”. Enable provided records which indicated the A-South segment under review due to the reported girth weld failure, has a MAOP established per §192.619(a)(4) using industry and agency guidance. The Safe Operating History forms referenced by PHMSA are more comprehensive reviews than current requirements of §192.619(a)(4), which only require consideration of material property records, including material properties verified in accordance with §192.607 (not applicable to this segment for this incident) and the history of the pipeline segment, including known corrosion and actual operating pressure.

The §192.619(a)(4) Safe Operating History form format provided to PHMSA during this incident investigation has been provided to PHMSA and state inspectors during multiple Part 191 & 192 Integrated Inspections over the past several years. These forms have been reviewed by PHMSA and state inspectors and found adequate to establish MAOP per §192.619(a)(4) which historically stated: “The pressure determined by the operator to be the maximum safe pressure after considering the history of the segment, particularly known corrosion and the actual operating pressure” . .

The INGAA Fitness for Service bulletins referenced by PHMSA were industry efforts to provide solutions to operators with non-TVC MAOP records prior to §192.624 becoming effective in July 2020. In 2013, PHMSA released a draft version of the Integrity Verification Process flowchart which also attempted to provide a solution for non-TVC MAOP records. Both of these efforts, for HCAs and Class 3 and Class 4 transmission pipeline segments, have now been superseded by §192.624 and, in conjunction with §192.607, this now provides guidance for operators to Reconfirm MAOP for pipelines with non-TVC records. The portion of A-South which experienced the failure, however, is not included in the §192.624 requirements and therefore §192.624 does not apply to this segment of pipe. As a result, EGT continues to rely on these fitness for service documents to demonstrate its method for establishing a safe MAOP.

During the A-South failure investigation, PHMSA’s questions and Enable’s responses were predominantly focused on the failure location. It is unclear how PHMSA made a determination that the entire 22.3 miles of A-South have inadequate records to meet the requirements of §192.619(a) for establishing the MAOP. Records for the entire A-South pipeline were not requested and were not provided.

As a result, EGT believes neither the NOPV nor the Proposed Compliance Order, should implicate the entirety of Line A-South. Further, for the reasons set forth above related to how MAOP was established for the segment at issue, EGT believes both the NOPV, and the Proposed Compliance Order should be withdrawn.

If you have any further questions or require additional information, please do not hesitate to contact me.



Sincerely,

A handwritten signature in blue ink, appearing to read "Cary D. Watson", with a long horizontal flourish extending to the right.

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