



Pipeline Safety
Enable Midstream Partners
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May 3, 2021

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road
Suite 300
West Trenton, NJ 08628

Subject: Enable Gas Transmission, LLC - Response to PHMSA Notice of Amendment CPF 1-2021-033-NOA

Dear Mr. Burrough,

This letter constitutes the response of Enable Gas Transmission, LLC (EGT) to Notice of Amendment, CPF 1-2021-033-NOA, issued by Pipeline and Hazardous Materials Safety Administration (PHMSA) on April 1, 2021 and received by EGT on April 5, 2021. The underlying PHMSA inspection took place on November 4-5 and 18, 2020, and included EGT's procedures for its Ruston underground natural gas storage operations in Lincoln Parish, Louisiana. Following inspection, PHMSA identified the following as areas of apparent inadequacy within EGT's plans or procedures:

CPF 1-2021-033-NOA:

EGT's written procedures for carrying out its integrity management program under API RP 1171, Section 8 were inadequate. Specifically, EGT did not have a process to assess threat and hazard interaction in accordance with API RP 1171, Section 8.3.2 (Section 8.3.2).

Section 8.3.2 states in part:

The operator shall use available information such as performance data collected through the field history, operations and maintenance (O&M) activities, geotechnical data such as well logs, engineering data, and completion reports to determine susceptibility to threat and hazard-related events and to assess threat and hazard interaction.

During the inspection, EGT reported that they had not established a procedure to assess threats and hazard interaction.

Therefore, EGT's written procedures required by § 192.12(d)(4) were inadequate. EGT must revise its procedures to include how it will assess threat and hazard interaction in accordance with Section 8.3.2.

Resolution:

Enable Gas Transmission has updated GS-300, Risk Management Program, which is currently in the Management of Change (MOC) process and will be posted and implemented by May 31, 2021. The revised procedure and Threat/Hazard Interaction Matrix are attached.



With the change to our Risk Management Program (GS-300), we believe EGT has fulfilled the requirements of this Notice of Amendment. 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, appearing to read "Cary D. Watson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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

Exhibits:

1. Threat/Hazard Interaction Matrix
2. GS-300, Risk Management Program