

January 4, 2022

Robert Burrough
Director, Eastern Region
PHMSA Pipeline Safety
840 Bear Tavern Road
Suite 300
West Trenton, NJ 08628

Subject: Enable Mississippi River Transmission, LLC - Response to PHMSA Notice of Amendment, CPF 1-2021-069

Dear Mr. Burrough,

Enable Mississippi River Transmission, LLC (EMRT) hereby submits the following response to the proposed Pipeline and Hazardous Materials Safety Administration (PHMSA) Notice of Amendment, CPF 1-2021-069, issued December 10, 2021 and received by EMRT on December 14, 2021. This alleged inadequacy was identified during a PHMSA Underground Storage inspection that occurred between June 14, 2021 and June 18, 2021 on EMRT's St. Jacob Storage assets located in Illinois. An excerpt of the NOA is included below.

From June 14, 2021 to June 18, 2021, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Enable Mississippi River Transmission, LLC's (Enable) records and procedures for Enable's underground storage construction activities in Saint Jacobs, Illinois. On the basis of the inspection, PHMSA has identified the apparent inadequacy found within Enable's plans or procedures, as described below:

1. § 192.12 Underground natural gas storage facilities.

(a) ...

(c) Procedural manuals. Each operator of a UNGSF must prepare and follow for each facility one or more manuals of written procedures for conducting operations, maintenance, and emergency preparedness and response activities under paragraphs (a) and (b) of this section. Each operator must keep records necessary to administer such procedures and review and update these manuals at intervals not exceeding 15 months, but at least once each calendar year. Each operator must keep the appropriate parts of these manuals accessible at locations where UNGSF work is being performed. Each operator must have written procedures in place before commencing operations or beginning an activity not yet implemented.

Enable's written procedures for conducting operations, maintenance, and emergency preparedness and response activities were inadequate to ensure safe operation of a pipeline facility. Specifically, Enable failed to have written procedures that specified compliance with applicable fire codes and regulations, as required by API RP 1171, Section 10.3.21 (Section 10.3.2) and incorporated by reference under § 192.12(b)(2), as required by § 192.12(c).

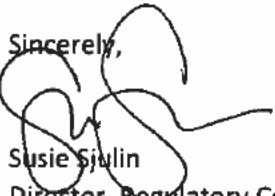
During the inspection, PHMSA observed that fences or enclosures were placed at gas storage wells. However, Enable's procedures failed to specify that fences or enclosures shall comply with applicable fire codes and regulations as required by Section 10.3.2. After the inspection, Enable confirmed to PHMSA over email that, at the time of the inspection, they had fences or enclosures at the St. Jacob gas storage wells, but they did not have procedures in place to ensure they complied with applicable state and local fire codes.

Therefore, Enable's written procedures required by § 192.12(c) were inadequate. Enable must revise its procedures to address applicable fire codes and regulations for fences or enclosures in accordance with Section 10.3.2.

During the inspection, and prior to the issuance of PHMSA's Preliminary Findings and or this NOA, EMRT completed and provided the PHMSA Inspector its procedure revision addressing the concern identified. Included as exhibits are the revised procedure and MOC Summary of Change for Enable's procedure GS-350 "Securing Gas Storage Well Sites".

Through the actions specified in this letter, we believe EMRT has fulfilled the requirements outlined in the PHMSA NOA. If you have any questions concerning the information contained in this response, please do not hesitate to contact me.

Sincerely,



Susie Sjulin
Director, Regulatory Compliance
Enable Midstream Partners, LP

Exhibits/Attachments:

1. GS-350 "Securing Gas Storage Well Sites"
2. MOC Summary of Change - GS-350 Securing Gas Storage Well Sites