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November 30, 2022

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

RE: CPF 1-2022-070-NOPV – RESPONSE TO NOTICE OF PROBABLE VIOLATION, AND PROPOSED COMPLIANCE ORDER

Dear Mr. Burrough,
On November 03, 2022, TC Energy Corporation, on behalf of its subsidiary Tuscarora Gas Transmission Company, received CPF 1-2022-070 Notice of Probable Violation and Proposed Compliance Order (Notice). TC Energy is not contesting the Notice, however in accordance with 49 CFR § 190.208, TC Energy is providing the following information.

The Notice alleges that Tuscarora failed to follow its manual of written procedures for conducting operations and maintenance activities. Specifically, that Tuscarora failed to tighten stud bolts on flange joints at Spanish Springs Meter Station (Washoe County, NV), Tracy 01 Meter Station (Storey County, NV), and the Tracy CC Delivery Meter Station (Storey County, NV) in accordance with its written specification.

To clarify, the flange bolts in question were tightened and torqued appropriately, however were not installed correctly, resulting in short bolts on flanges at the meter stations in question. TC Energy contends that the flange joints are associated with § 192.147 Flanges and flange accessories and § 192.303 Compliance with specifications or standards and not part of TC Energy's Operations and Maintenance (O&M) Manual.

During the inspection TES-ME-FBT-GL was provided which states "The purpose of this Specification is to identify the requirements for tightening flange bolts and is intended to be used by those performing the installation of a flanged joint." The flanged joint locations in question have short bolts that were from original construction.

Additionally, in response to the Proposed Compliance Order, TC Energy has completed the replacement of bolts at Spanish Springs Meter Station and have scheduled to replace the bolts in a planned outage in Q2 of 2023 at Tracy 01 Meter Station and Tracy CC Delivery Meter Station.

Should you have any question, require any additional information, or would like to meet to discuss any of the information above, please do not hesitate to contact me. I can be reached via email or at 701-290-1176.

Sincerely,

A handwritten signature in black ink that reads "Daniel C Cerkoney".

Daniel C. Cerkoney

Interim Director, US Regulatory Compliance – PHMSA Relations