

April 17, 2024

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 1-2024-0014-NOA – NOTICE OF AMENDMENT – TC ENERGY RESPONSE

Mr. Burrough,

On March 19, 2024, TC Energy, on behalf of its subsidiary, ANR Pipeline Company, received CPF 1-2024-014-NOA – Notice of Amendment (Notice). TC Energy has reviewed the Notice and is providing the following response:

The TC Energy Engineering Standard titled: TES-MA-FLGEU-GL Carbon Steel Butt-Welded Flanges was revised to include the following requirement:

This Specification is to be used in conjunction with MSS SP-44, Specification for Steel Pipeline Flanges, latest edition, including any amendment, supplement or errata issued by MSS in addition to version incorporated by reference in 49 CFR §192.7 or 49 CFR §195.3, as applicable. This Specification provides requirements in addition to those of MSS SP-44 and was written based on the 2019 edition of MSS SP-44. For pipelines and facilities in the United States and regulated by 49 CFR 192 or the equivalent intrastate regulation, the requirements specified in this specification and MSS SP-44-2019 must be equivalent or exceed the requirements of Code of Federal Regulations (CFR), 192.147 (a) and 192.7 (g) (1), Title 49 Part 192, Transportation of Natural and Other Gas by Pipeline that incorporates by reference MSS SP-44-2010, Standard Practice, "Steel Pipeline Flanges," 2010 edition, (including Errata (May 20, 2011)).

In addition, TC Energy has developed and is providing the Commentary: TES-MA-FLGEU-GL Carbon Steel Butt-Welding Flanges (US-MEX).

TC Energy conducted a gap analysis comparing the 2010, 2016 and 2019 versions of MSS SP-44. During the subsequent revision of MSS SP-44 in 2016 and 2019, TC Energy reviewed the update/gap and followed the internal process of proprietary spec revision defining requirements for the materials, qualification, manufacture, testing and inspection of carbon steel butt-welding flanges. This gap analysis show TES-MA-FLGEU-GL based on MSS SP-44-2019 meet or exceed the minimum requirements of MSS SP-44-2010 as specified in 192.7 IBR.

This standard and commentary were published in the TC Energy Controlled Document Library on April 16, 2024, and available to all TC Energy employees. By taking these actions, TC Energy contends the requirements of the Notice have been satisfied and requests closure of this Notice.

Should you wish to discuss, please contact me at (832) 320-5031.

Respectfully,

A handwritten signature in black ink that reads "Amy Willis".

Amy Willis
Director, Pipeline Safety Compliance US Natural Gas

Attachments: TES-MA-FLGEU-GL Carbon Steel Butt-Welded Flanges and COMMENTARY: TES-MA-FLGEU-GL Carbon Steel Butt-Welding Flanges (US-MEX)