

## NOTICE OF AMENDMENT

**VIA ELECTRONIC MAIL TO: tina faraca@tcenergy.com**

July 5, 2024

Ms. Tina Faraca  
President and Chief Executive Officer  
ANR Pipeline Company  
a subsidiary of TC Energy Corporation  
700 Louisiana Street, Suite 700  
Houston, Texas 77002

**CPF 1-2024-052-NOA**

Dear Ms. Faraca:

From January 30 to January 31, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected ANR Pipeline Co.'s (ANR) construction procedures in Delhi, Louisiana, as part of the construction inspected at ANR's Delhi Compressor Station.

As a result of the inspection, PHMSA has identified an apparent inadequacy found within ANR's plans or procedures. The item inspected and the inadequacy is described below:

**1. § 192.303 Compliance with specifications or standards.**

**Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.**

ANR's written procedures for constructing its pipeline in accordance with the requirements of Subpart G of 49 CFR Part 192 were inadequate to ensure pipeline safety. Specifically, ANR's TC Energy Engineering Specification: *TES-MA-VALV-G Steel Valves for Gas Service Specification*, Rev. 02, 2022-Dec-01 (TES-MA-VALV-G), failed to adequately reference the correct edition of the American Petroleum Institute (API), Specification ANSI/API 6D that is required by § 192.145(a)<sup>1</sup> and incorporated by reference in § 192.7(b)(8).<sup>2</sup>

During the inspection, PHMSA reviewed TES-MA-VALV-G, which contained information

regarding ANR's use of manufactured carbon steel ball, check, gate, and plug valves with a specified outside diameter of NPS 16 (406.4 mm) and larger, and a pressure class of PN 20 (ASME 150) and higher. TES-MA-VALV-G stated in part that it was written based on the 25th edition of API 6D, November 2021 and errata 1 and 2. However, § 192.145(a) specifies that each valve (other than cast iron and plastic) must meet the minimum requirements of ANSI/API Spec 6D, and § 192.7(b)(8) incorporates by reference ANSI/API Specification 6D, "Specification for Pipeline Valves," 23rd edition. TES-MA-VALV-G also required its utilization in conjunction with API 6D, Specification for Valves, latest edition; however, § 192.7(b)(8) does not incorporate by reference the latest edition of API 6D but instead incorporates by reference ANSI/API Specification 6D, "Specification for Pipeline Valves," 23rd edition.

Therefore, ANR's written specifications were inadequate pursuant to the requirements of § 192.303 as it relates to § 192.145(a) and § 192.7(b)(8). ANR must revise its specification to meet the requirements of § 192.303.

#### Response to this Notice

Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that ANR Pipeline Co maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2024-052-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*

<sup>1</sup> § 192.145 Valves.

- (a) Except for cast iron and plastic valves, each valve must meet the minimum requirements of ANSI/API Spec 6D (incorporated by reference, see § 192.7), or to a national or international standard that provides an equivalent performance level. A valve may not be used under operating conditions that exceed the applicable pressure-temperature ratings contained in those requirements.

<sup>2</sup> § 192.7 What documents are incorporated by reference partly or wholly in this part?

- (a) ...
- (b) American Petroleum Institute (API), 200 Massachusetts Ave. NW, Suite 1100, Washington, DC 20001, and phone: 202-682-8000, website: <https://www.api.org/>.
  - (1) ...
  - (8) ANSI/API Specification 6D, "Specification for Pipeline Valves," 23rd edition, effective October 1, 2008, including Errata 1 (June 2008), Errata 2 (November 2008), Errata 3 (February 2009), Errata 4 (April 2010), Errata 5 (November 2010), Errata 6 (August 2011) Addendum 1 (October 2009), Addendum 2 (August 2011), and Addendum 3 (October 2012), (ANSI/API Spec 6D), IBR approved for § 192.145(a).