

August 1, 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 1-2024-052-NOA – NOTICE OF AMENDMENT – TC ENERGY RESPONSE

Mr. Burrough,

On July 5, 2024, TC Energy, on behalf of its subsidiary, ANR Pipeline Company, received CPF 1-2024-052-NOA – Notice of Amendment (Notice). TC Energy has reviewed the Notice and is providing the following response:

The TC Energy Engineering Specification titled: TES-MA-VALV-G Steel Valves for Gas Service Specification (CAN-US-MEX) was revised to include the following requirement:

This Specification is to be used in conjunction with ANSI/API 6D, Specification for Valves, latest edition, including any amendment, supplement or errata issued by ANSI/API. The requirements in this specification are in addition to those of API 6D (latest edition), 49 CFR 192.7 (b)(8) Incorporated by Reference and the most recent edition of CSA Z245.15. This specification was written based on the 25th edition of API 6D, November 2021 and errata 1 and 2.

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 API Specification 6D 25th edition must be equivalent or exceed the requirements of Code of Federal Regulations (CFR), 192.145 (a) and 192.7 (b) (8), Title 49 Part 192, Transportation of Natural and Other Gas by Pipeline that incorporates by ANSI/API Specification 6D, "Specification for Pipeline Valves," 23rd edition and 24th edition including errata and addendum, as specified

In addition, TC Energy has developed and is providing the Commentary: TES-MA-VALV-G Steel Valves for Gas Service Specification (CAN-US-MEX)

TC Energy conducted a comparison/gap analysis between API 6D 23rd, API 6D 24th and API 6D 25th by the Company (refer to internal specification Commentary), it is determined the requirements of the 25th edition is equivalent or more stringent than the 23rd and 24th edition. The requirements in this specification include and may exceed those from API 6D (25th edition) and 49 CFR 192.7 (b)(8) Incorporated by Reference.

This specification and commentary were published in the TC Energy Controlled Document Library on August 01, 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, appearing to read "Amy Willis", written in a cursive style.

Amy Willis
Director, Pipeline Safety Compliance
US Natural Gas

Attachments: TES-MA-VALV-G Steel Valves for Gas Service Specification (CAN-US-MEX) and
COMMENTARY: TES-MA-VALV-G Steel Valves for Gas Service Specification (CAN-US-MEX)