

NOTICE OF AMENDMENT

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

July 1, 2025

Ms. Tina Faraca
Executive Vice President and Chief Operating Officer
U.S. Natural Gas Pipelines
Columbia Gas Transmission, LLC, a subsidiary of TC Energy Corporation
700 Louisiana Street
Houston, Texas 77002

CPF 1-2025-024-NOA

Dear Ms. Faraca:

From February 27 through December 12, 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 Columbia Gas Transmission, LLC's (CGT) construction project at the Artemas Compressor Station and the related CGT construction procedures in Artemas, Pennsylvania.

As a result of the inspection, PHMSA has identified the apparent inadequacy found within CGT's plans or procedures. The item inspected, alleged inadequacy, and proposed revision 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.

CGT's written procedures for constructing its pipeline are inadequate to assure safe operation in accordance with section 192.303. Specifically, CGT's TC Energy Engineering List: *TEL-MA-STD-G Materials List for Gas Piping System, Rev-1* (10/1/21) (Materials List), failed to reference the edition of the American Society of Mechanical Engineers (ASME), Standard ASME/ANSI B16.5, that is required by section 192.147(a) (Jan. 5, 2015).¹

¹ § 192.147 Flanges and flange accessories.

(a) Each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B16.5 and MSS SP-44 (incorporated by reference, *see* § 192.7), or the equivalent.

During the inspection, PHMSA reviewed TC Energy's Engineering Specification: *TES-MA-FLGEU-GL Carbon Steel Butt-Welding Flanges, Rev-04* (4/19/24) (Engineering Spec), which contained information regarding CGT's use of manufactured carbon steel butt-welding flanges with a specified outside diameter of NPS 16 (406.4 mm) and larger, and Carbon Steel Grade F42 (Grade 290) to Grade F80 (Grade 550). In accordance with the Engineering Spec, smaller sizes (less than NPS 16) and lower grades of flanges may be used in accordance with its Materials List. PHMSA then reviewed the Materials List, which stated in part that it is intended to list acceptable industry standards and specifications applicable to CGT's material requirements for new piping systems. Tables 1-1, 1-2, and 1-3 of the Materials List included the standards and specifications applicable to high-pressure gas pipeline and pipeline facilities, particularly specifying ASME B16.5 as the standard applicable to flanges with NPS 4 to 14 for pipeline and to flanges with NPS ½ to 3 for pipeline assemblies and facilities. However, none of the tables, or any other section of the Materials List or Engineering Spec, indicated the specific edition of the ASME B16.5 Standard that is applicable to the listed flanges.

Therefore, CGT's written procedures for constructing its pipeline are inadequate to assure safe operation in accordance with section 192.303. PHMSA proposes that CGT must revise its procedures to address this inadequacy.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 CFR § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Enforcement Proceedings.

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 section 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 CFR § 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 Columbia Gas Transmission, LLC 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 1-2025-024-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*