

July 30, 2025

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 1-2025-024-NOA – NOTICE OF AMENDMENT – TC ENERGY RESPONSE

Mr. Burrough,

On July 1, 2025, TC Energy, on behalf of its subsidiary Columbia Gas Transmission LLC, received CPF 1-2025-024-NOA – Notice of Amendment (Notice). TC Energy has reviewed the Notice and is not contesting the enforcement. TC Energy has revised the procedure *TEL-MA-STD-G Materials List for Gas Piping Systems* to indicate the specific edition of ASME B16.5 Standard that is applicable for listed flanges.

TC Energy has enclosed with this letter a redlined copy of the revised procedure (*TEL-MA-STD-G Materials List for Gas Piping System US-MEX Rev 02 Redlines*) and a copy of the engineering analysis (*TEL-MA-STD-G Materials List for Gas Piping System Commentary*). The revision specifies the ASME B16.5 standard applicable to flanges with NPS 4 to 14 for pipeline and to flanges with NPS ½ to 3 for pipeline assemblies and facilities as required by the Notice.

Specifically, TC Energy has added a statement to the Scope allowing for the use of either of the two most recent editions of the industry standard provided that the standard revisions are equivalent or exceed the requirements of the version incorporated by reference in 49 CFR §192.7. Additionally, notes were added to *Table 4-2: External Industry References* indicating the specific editions of the ASME B16.5 (Note 4) that is allowed by the specification and the location of the company's engineering analysis (Commentary).

The revised procedure will be published to TC Energy's Control Document Library on August 20, 2025 and will be 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 dark ink, appearing to read "Amy Willis", written in a cursive style.

Amy Willis
Director, Pipeline Safety Compliance US Natural Gas

CC:

Ignacio Castro, PHMSA General Engineer- Inspector

Joseph Klesin, PHMSA Operations Supervisor

Daniel Cerkoney, TC Energy, Senior Manager – Pipeline Safety Engineering and Governance

Enclosures:

TEL-MA-STD-G Materials List for Gas Piping System US-MEX Rev 02 Redlines

TEL-MA-STD-G Materials List for Gas Piping System (US-MEX)_Commentary