



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

VIA EMAIL TO: matthew.akman@enbridge.com

April 29, 2026

Matthew Akman
EVP & President GTM
East Tennessee Natural Gas LLC
915 North Eldridge Parkway
Houston, Texas 77079

CPF 1-2026-011-NOA

Dear Mr. Akman:

From March 31 through December 11, 2025, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), Eastern Region, pursuant to Chapter 601 of Title 49 United States Code (U.S.C.), inspected East Tennessee Natural Gas LLC's (ETNG or Respondent) plans, procedures, records, and facilities in Georgia, North Carolina, Texas, Tennessee, and Virginia.

As a result of the inspection, Eastern Region has identified an apparent inadequacy found within ETNG's plans or procedures. The alleged inadequacy and proposed revision are described below:

1. **§ 192.631 Control room management.**
 - (a) ...
 - (c) ***Provide adequate information.*** Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:
 - (1) ...
 - (3) **Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months;**

ETNG's written control room management procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, ETNG's internal communications procedure, *CRM-08.2011 V 2.0* (02/11/2025) (Internal Communication Plan or ICP), failed to provide adequate information to test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months, in accordance with section 192.631(c)(3).

During the inspection, the Eastern Region inspector reviewed ETNG's Internal Communication Plan. Section 6.10.4 in the ICP stated, "[t]he ICP Log in the Gas Control Applications will be used to document and retain annual testing." However, the ICP Log was not defined in the procedure. Discussions with ETNG representatives confirmed that depending on the scenario, both digital and paper records were utilized during annual testing. It was unclear whether the ICP Log mentioned in the procedure included paper forms, or just the ICP digital application. The absence of a consistent form or definition for ICP Log within the procedure precludes consistent documentation and retention of annual testing.

Therefore, ETNG's written control room management procedures were inadequate to ensure safe operation of a pipeline facility. Eastern Region proposes that ETNG revise its procedures to address the above deficiency.

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 49 CFR § 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 ETNG maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to the Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety. In correspondence concerning this matter, please refer to **CPF 1-2026-011-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

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

cc: Michael Koby, SVP & CEO, GTM, ETNG, michael.koby@enbridge.com
Peter Seydewitz, Dir., Operational Excellence, ETNG, peter.seydewitz@enbridge.com

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