



Via Electronic Mail

May 29, 2026

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

**RE: East Tennessee Natural Gas, LLC
Notice of Amendment
CPF 1-2026-011-NOA**

Dear Mr. Burrough,

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's¹ (ETNG or Respondent) plans, procedures, records, and facilities in Georgia, North Carolina, Texas, Tennessee, and Virginia.

On April 29, 2026, PHMSA issued the above referenced Notice of Amendment (NOA) identifying one (1) apparent inadequacy in ETNG's plans and procedures. The following is a brief summary of PHMSA's concerns and ETNG's response to those concerns.

PHMSA Finding

1. § 192.631 Control room management.

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

¹ East Tennessee Natural Gas, LLC is a subsidiary of Enbridge, Inc.

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.

ETNG Response

ETNG recognizes that its written procedure, *CRM-08.2011 V 2.0 Internal Communications Procedure*, may not have provided a clear definition for ICP Log based on the discussion referenced in the above NOA.

ETNG has since made revisions to the *Internal Communications Procedure* to include a clearer definition for the ICP Log as a digital application only. These revisions have been reviewed and discussed with the Eastern Region inspector on May 26, 2026. Following that discussion, the inspector requested the revised version (3.0) be submitted in order for the concern in this NOA to be officially addressed and the NOA closed out. A copy of a revised version of this procedure is enclosed. The revisions to address this concern can be found in section 7.10, *Annual Testing*.

ETNG is committed to the continual improvement of its safety processes and procedures. We appreciate PHMSA's consideration of the foregoing response to this NOA. Please call me at (713) 627-6601 if you require additional information or have any questions.

Sincerely,



Peter Seydewitz
Director, Operational Excellence
GTM Engineering & Asset Management

Attachments:

1. Internal Communications Procedure, CRM-08.2011 Version 3.0