



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

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**NOTICE OF PROBABLE VIOLATION
and
PROPOSED COMPLIANCE ORDER**

VIA ELECTRONIC MAIL TO: david_brast@tcenergy.com

February 12, 2026

Mr. David Brast
President, U.S. Natural Gas Pipelines
TC Energy
700 Louisiana Street
Houston, Texas 77002

CPF 1-2026-015-NOPV

Dear Mr. Brast:

From May 12, 2024 through December 15, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.), conducted an inspection of Columbia Gas Transmission LLC's¹ (Columbia) facilities and records in Pennsylvania, Maryland, and West Virginia.

As a result of the inspection, it is alleged that Columbia has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

- 1. § 192.161 Supports and anchors.**
 - (a) Each pipeline and its associated equipment must have enough anchors or supports to:**
 - (1) Prevent undue strain on connected equipment;**
 - (b) ...**
 - (c) Each support or anchor on an exposed pipeline must be made of durable, noncombustible material and must be designed and installed as follows:**
 - (1) Free expansion and contraction of the pipeline between supports or anchors may not be restricted.**

¹ Columbia Gas Transmission LLC is a subsidiary of TC Energy.

- (2) Provision must be made for the service conditions involved.**
- (3) Movement of the pipeline may not cause disengagement of the support equipment.**

Columbia failed to ensure that each support or anchor on an exposed pipeline prevents undue strain on connected equipment and is made of durable, noncombustible material in accordance with sections 192.161(a)(1) and (c). Specifically, Columbia used non-durable, combustible materials (wooden supports precariously stacked on top of each other) for a gas heater and associated piping at the Grimes Meter Station.

During the inspection, the PHMSA inspector observed a gas heater with a piping manifold located at the Grimes Meter Station. The manifold was supported by wooden blocks and consisted of gas carrying piping, regulation equipment, and valves. The apparatus was supported by nondurable flammable materials and placed undue strain on the connection to the heater. The wooden structure was unfastened.

Therefore, Columbia failed to ensure that each support or anchor on an exposed pipeline prevents undue strain on connected equipment and is made of durable, noncombustible material in accordance with sections 192.161(a)(1) and (c).

2. § 192.481 Atmospheric corrosion control: Monitoring.

- (a) Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:**

Pipeline type:	Then the frequency of inspection is:
(1) Onshore other than a Service Line	At least once every 3 calendar years, but with intervals not exceeding 39 months.
(2) Onshore Service Line	At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in paragraph (d) of this section.
(3) Offshore	At least once each calendar year, but with intervals not exceeding 15 months.

- (b) During inspections the operator must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.**

Columbia failed to inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at least once every 3 calendar years, but with intervals not exceeding 39 months in accordance with section 192.481(a). Specifically, Columbia failed to inspect and evaluate an exposed portion (site 6570) of Line MC pipeline near the Hawlings River in Montgomery County, Maryland.

During the inspection, PHMSA reviewed records for pipeline exposures. Columbia discovered an exposed portion (site 6570) of Line MC pipeline near the Hawlings River in Montgomery County, Maryland on February 25, 2020. PHMSA requested additional records, but Columbia failed to provide any records indicating Columbia inspected and evaluated site 6570 after February 25, 2020.

Therefore, Columbia failed to inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at least once every 3 calendar years, but with intervals not exceeding 39 months in accordance with section 192.481(a).

3. § 192.625 Odorization of gas.

- (a) A combustible gas in a distribution line must contain a natural odorant or be odorized so that at a concentration in air of one-fifth of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell.**
- (b) After December 31, 1976, a combustible gas in a transmission line in a Class 3 or Class 4 location must comply with the requirements of paragraph (a) of this section unless:**

Columbia's transmission line failed to contain a natural odorant or be odorized so that at a concentration in air of one-fifth of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell in accordance with section 192.625. Specifically, Columbia failed to odorize its 120.9-mile pipeline system in Maryland (Lines MA and MB), which are transmission lines in a Class 3 or Class 4 location.

During the inspection, the PHMSA inspector observed Columbia personnel enter a building at Sharon Meter Station, which is on Line MA, containing gas carrying equipment. The individual was equipped with a personal gas detector and immediately after entering the device audibly alarmed indicating an unsafe atmosphere within the space. No individual present noticed an odor beforehand or afterwards, including the Columbia employee who entered the space. As the gas was within a building/enclosed space, if the gas was odorized, among all of those present a plurality should have been able to smell the gas. Following the inspection, Columbia provided records, System Map Odorization Facility Locations (May 2021), demonstrating that no odorant injection facilities exist in Maryland. Furthermore, records provided indicate that gas flows from north to south. The nearest odorization injection point is in Pennsylvania.

Therefore, Columbia's transmission line failed to contain a natural odorant or be odorized so that at a concentration in air of one-fifth of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell in accordance with section 192.625.

4. § 192.739 Pressure limiting and regulating stations: Inspection and testing.

- (a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is—**

- (1) **In good mechanical condition;**
- (2) **Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;**
- (3) **Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of § 192.201(a); and**
- (4) **Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.**

Columbia failed to inspect and test each pressure limiting station, relief device (except rupture discs), and pressure regulating station at intervals not exceeding 15 months, but at least once each calendar year in accordance with section 192.739(a). Specifically, Columbia failed to inspect and test relief valves at Salisbury Compressor Station.

During the inspection, PHMSA reviewed records for Salisbury Compressor Station relief valves inspections and determined that safety valves with equipment tags 1094666, 11077685, 11173593 were inspected and tested at intervals exceeding the 15-month maximum interval. Relief device 1094666 was tested on 3/1/2020 and not again until 3/1/2024. Relief device 11077685 was tested on 3/1/2020 and not again until 3/1/2023. Relief device 11173593 was tested on 3/1/2020 and not again until 3/1/2024.

Therefore, Columbia failed to inspect and test each pressure limiting station, relief device (except rupture discs), and pressure regulating station at intervals not exceeding 15 months, but at least once each calendar year in accordance with section 192.739(a).

5. § 192.905 How does an operator identify a high consequence area?

- (a) ***General.* To determine which segments of an operator's transmission pipeline system are covered by this subpart, an operator must identify the high consequence areas. An operator must use method (1) or (2) from the definition in § 192.903 to identify a high consequence area. An operator may apply one method to its entire pipeline system, or an operator may apply one method to individual portions of the pipeline system. An operator must describe in its integrity management program which method it is applying to each portion of the operator's pipeline system. The description must include the potential impact radius when utilized to establish a high consequence area. (See appendix E.I. for guidance on identifying high consequence areas.)**

Columbia failed to determine which segments of its transmission pipeline system are covered by subpart O in accordance with section 192.905(a). Specifically, Columbia failed to include in its integrity management program a pipeline segment with a potential impact radius (PIR) that affects a soccer field at the Albert Gallatin South Middle School in Point Marion, Pennsylvania.

During the inspection, PHMSA reviewed records for Columbia's high consequence area (HCA) determination for the area around Albert Gallatin South Middle School in Point Marion, Pennsylvania. The record, HCA ID – TCO-250, indicates that Columbia failed to determine the

PIR for a short lateral south of the school's softball and soccer fields. Given the existing PIR and proximity of the pipeline to the soccer field, this segment must be included in Columbia's integrity management program under subpart O.

Therefore, Columbia failed to determine which segments of its transmission pipeline system are covered by subpart O in accordance with section 192.905(a).

Proposed Civil Penalty

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024, the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023, the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,412 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to propose a civil penalty assessment at this time.

Proposed Compliance Order

With respect to Items 1, 3, 4, and 5, pursuant to 49 U.S.C. § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to Columbia Gas Transmission, LLC. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Warning Item

With respect to Item 2, we have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to promptly correct this item. Failure to do so may result in additional enforcement action.

Response to this Notice

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. All material you submit in response to this enforcement action may be 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 your receipt of this Notice, you have 30 days to respond as described in the enclosed *Response Options*. 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 a Final Order. If you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from receipt of this Notice. The Region Director may extend the period for responding upon a written request timely submitted demonstrating good cause for an extension.

In your correspondence on this matter, please refer to **CPF 1-2026-015-NOPV** 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

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Enforcement Proceedings

PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Columbia Gas Transmission LLC (Columbia) a Compliance Order incorporating the following remedial requirements to ensure the compliance of Columbia with the pipeline safety regulations:

- A. In regard to 1 of the Notice pertaining to Columbia's failure to ensure that each support or anchor on an exposed pipeline prevents undue strain on connected equipment and is made of durable, noncombustible material, Columbia must remediate the supports by replacement with durable, noncombustible material that prevents undue strain on connected equipment and provide records of the remediation to the Director, Eastern Region within **120** days of receipt of the Final Order.
- B. In regard to 3 of the Notice pertaining to Columbia's transmission line failure to contain a natural odorant or be odorized so that at a concentration in air of one-fifth of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell, Columbia must odorize Lines MA and MB in the state of Maryland in accordance with 49 CFR § 192.625 and provide records of the odorization to the Director, Eastern Region within **270** days of receipt of the Final Order.
- C. In regard to 4 of the Notice pertaining to Columbia's failure to inspect and test each pressure limiting station, relief device (except rupture discs), and pressure regulating station at intervals not exceeding 15 months, but at least once each calendar year, Columbia must improve its safety valve inspection process to ensure that all gas pressure relief and regulating systems will be inspected at the required interval and provide the updated process to the Director, Eastern Region within **90** days of receipt of the Final Order.
- D. In regard to 5 of the Notice pertaining to Columbia's failure to determine which segments of its transmission pipeline system are covered by 49 CFR Part 192 Subpart O, Columbia must include in its integrity management program the pipeline segment with a potential impact radius (PIR) that affects a soccer field at the Albert Gallatin South Middle School in Point Marion, Pennsylvania (HCA ID – TCO-250) and provide the updated integrity management program records/maps to the Director, Eastern Region within **120** days of receipt of the Final Order.
- E. It is requested (not mandated) that Columbia Gas Transmission maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.