



U.S. Department
of Transportation
**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, New Jersey 08628
609.771.7800

NOTICE OF AMENDMENT

VIA EMAIL TO: david_brast@tcenergy.com

May 4, 2026

Mr. David Brast,
President, US Natural Gas Pipelines
Great Lakes Gas Transmission
700 Louisiana Street
Houston, Texas 77002

CPF 1-2026-018-NOA

Dear Mr. Brast:

From March 18 through December 3, 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 Great Lakes Gas Transmission LP's (GLGT) procedures, records, and facilities in Minnesota, Michigan, and Wisconsin.

As a result of the inspection, Eastern Region has identified apparent inadequacies found within GLGT's plans or procedures. The alleged inadequacies are described below:

1. **§ 192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (a) ***General.*** Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline

system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

(b) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) ...

(2) Controlling corrosion in accordance with the operations and maintenance requirements of subpart I of this part.

GLGT's manual of written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, GLGT's procedure, *TES-CO-EPU-GL Field Applied External Coating (CAN-US-MEX) Rev 18 (05/01/2023)* (Coatings Procedure), failed to include procedures for controlling corrosion in accordance with the operations and maintenance requirements of subpart I of Part 192, as required by section 192.605(b)(2).

During the inspection, the Eastern Region inspector reviewed the Coatings Procedure. The Coatings Procedure outlined approved coating materials in section 2.4, which referred to Table 2-1 for company-approved external liquid coatings. Table 2-1 specified that abrasive service required a higher dry film thickness than non-abrasive service. The Coatings Procedure defined abrasive service, but the definition lacked specificity as it did not utilize quantitative criteria to define abrasive service conditions.

Further, the procedure failed to clearly define the party responsible for determining when an abrasive service coating is required. Section 2.1.10 of the Coatings Procedure required that the Coating Applicator submit an Inspection and Test Plan (ITP) for review of the supply and application of coating materials before starting work. The ITP was to be reviewed by either the Company Coating Inspector or the Company Coating SME. It is unclear in the Coatings Procedure whether either of these parties are responsible for determining whether abrasive service coatings are required.

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

2. § 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;

GLGT's written procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, GLGT's procedure, *TC Energy West – Manual Pipeline Operations Procedure (US) Rev 13* (11/1/2024) (Manual Operations Procedure), failed to include the information necessary to test and verify its internal communication plan to provide adequate means for manual operation of the pipeline safely in accordance with section 192.631(c)(3).

During the inspection, the Eastern Region inspector reviewed the Manual Operations Procedure. Section 1.10 of the Manual Operations Procedure required controllers to record operational information on Manual Operations Logs (Form). The Manual Operations Procedure specified the location of the Form, but failed to specify the required format of the Form and failed to specify what information the Form must include. The Manual Operations Procedure also does not require the Form to be classified as a controlled document that would be subjected to the required annual review cycle.

Therefore, GLGT's written procedures were inadequate to ensure safe operation of a pipeline facility in accordance with section 192.631(c)(3). Eastern Region proposes that GLGT 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 Respondent 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 1-2026-018-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

ROBERT THOMAS
BURROUGH

Digitally signed by ROBERT
THOMAS BURROUGH
Date: 2026.05.04 15:05:07
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Robert Burrough
Director, Eastern Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

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

cc: Amy Willis, Director, US Regulatory Compliance, GLGT, amy_willis@tcenergy.com
Mike Murphy, Senior Manager, Pipeline Safety Compliance Governance and
Engineering, mikej_murphy@tcenergy.com