

June 3, 2026

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 1-2026-018-NOA – NOTICE OF AMENDMENT – TC Energy - GLGT RESPONSE

Dear Mr. Burrough,

On May 5, 2026, TC Energy, on behalf of its subsidiary Great Lakes Gas Transmission (GLGT), received CPF 1-2026-018-NOA – Notice of Amendment (Notice).

Notice Item 1

Notice Item 1 identified an apparent inadequacy in controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of 49 CFR Part 192, as required by §192.605(b)(2).

TC Energy has reviewed the Notice, is not contesting the allegation, and provides the following response:

TC Energy has revised the definition of “abrasive service” within procedure TES-CO-EPU-GL Field Applied External Coating (CAN-US-MEX). The updated definition is reflected in the redlined version of the procedure (attached) and provides enhanced clarity to ensure consistent identification and treatment of abrasive service conditions.

Notice Item 2

Notice Item 2 identified an apparent inadequacy in the procedures to include the information necessary to test and verify the internal communication plan for safe manual operation of the pipeline, in accordance with §192.631(c)(3).

TC Energy has reviewed the Notice, is not contesting the allegation, and provides the following response:

TC Energy has revised TC Energy West – Manual Pipeline Operations Procedure (US), Revision 13, to strengthen requirements for testing, documentation, and continuous improvement of manual pipeline operations.

Specifically, the procedure now:

- Requires that Manual Pipeline Operations Logs be included in the annual procedure review cycle
- Clarifies that all tests must be fully documented in the Manual Pipeline Operations Logs
- Requires development of a testing summary report, including recommendations to improve procedures and address identified deficiencies

In addition, the revised Manual Pipeline Operations Logs include, at a minimum, the following fields:

- Managers name
- Field tech name
- Date and time/hour of event and data collection
- Area or Responsibility (AOR) of event
- Affected compressor stations

- Key data collected from station personnel (Pressures, units, mode, rate, regulator settings as applicable)

The procedure further requires that Manual Pipeline Operations Logs be reviewed for accuracy and opportunities for improvement following each use, including tests, actual events, and during annual procedure reviews. An example of the Manual Operations Log template is now incorporated into the procedure (attached).

Upon PHMSA's acceptance, the revised procedures will be published in TC Energy's Management System Document Library (MSD) and made available to all applicable personnel.

TC Energy believes these actions adequately address the concerns identified in the Notice and satisfy the applicable regulatory requirements.

Should you wish to discuss, please feel free to contact me at (281)906-8467.

Respectfully,



Amy Willis

Director, Pipeline Safety Compliance

US Natural Gas

Attachments:

TC Energy West – Manual Pipeline Operations Procedure (US) Redline

TES-CO-EPU-GL Field Applied External Coating (CAN-US-MEX) Redline