



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: david_brast@tcenergy.com

March 16, 2026

David Brast
President/Chief Executive Officer
Tuscarora Gas Transmission Company
700 Louisiana St.
Houston, TX 77002

CPF 1-2026-024-NOA

Dear Mr. Brast:

From April 1 through December 2, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), Eastern Region, pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Tuscarora Gas Transmission Company's (Tuscarora or Respondent) procedures.¹

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

1. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a) ...

(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) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.

¹ Tuscarora is a subsidiary of TC Energy.

Tuscarora's procedures for maintenance and normal operations were inadequate to assure safe operation of a pipeline facility in accordance with section 192.605(b)(1). Specifically, Tuscarora's procedure, *Valve and Valve Actuator Inspection and Servicing, Rev. 03* (04/01/2024) (Valve Servicing Procedure), failed to include sufficient details regarding valve maintenance.

During the inspection, the Eastern Region inspector determined that Tuscarora's Valve Servicing Procedure (designated for US use) improperly referenced a "Canada-only" document—the *Canada Gas Valve Sealant and Sealant Guns Procedure* (CAN), Rev.-01, (Approved Lubricant Procedure)—for its approved list of valve lubricants. Furthermore, Tuscarora admitted that field technicians in practice rely on an unreferenced, laminated "Approved Lubricant Card" to perform this work. Tuscarora confirmed this card is an uncontrolled document containing no official title, revision history, or date, demonstrating a failure to adhere to established document control and procedural guidelines.

Finally, the Valve Servicing Procedure in section 1.2.6 directs Tuscarora to "re-energize a stem seal with a small amount of grease" and refers the reader to use "OEM specifications" to select the correct grease. However, the procedure failed to provide guidance on where to obtain OEM specifications.

Therefore, Tuscarora's procedures for maintenance and normal operations were inadequate to assure safe operation of a pipeline facility in accordance with section 192.605(b)(1). Eastern Region proposes that Tuscarora revise its procedures to address the above inadequacies.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 CFR § 190.206. Respondent must respond as set forth below.

Please review the enclosed *Response Options for Pipeline Operators in Enforcement Proceedings*. Respondent must respond to this Notice within 30 days of receipt. The Region Director may extend this period upon receipt of a timely written request demonstrating good cause. Failure to respond within 30 days (or by the extended deadline) constitutes a waiver of the right to contest the allegations in the Notice and authorizes the Associate Administrator for Pipeline Safety, without further notice to the Respondent, to find the facts as alleged in the Notice and to issue an Order Directing Amendment. If Respondent's plans or procedures are found inadequate as alleged in this Notice, Respondent will be ordered to amend its plans or procedures to correct the inadequacies. Once the inadequacies identified herein have been addressed in amended procedures, this enforcement action will be closed.

All material submitted in response to this enforcement action may be made publicly available. If Respondent believes that any portion of the responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document, it must provide a second copy of the document with the portions that may qualify for confidential treatment redacted and an explanation of why the redacted information may qualify for confidential treatment under 5 U.S.C. § 552(b).

PHMSA requests that Respondent maintain documentation of the safety improvement costs associated with fulfilling this Notice (preparation/revision of plans and procedures) and submit the total to the Region Director.

In correspondence on this matter, please refer to **CPF 1-2026-024-NOA**.

Sincerely,

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

cc: Dan Cerkoney, Sr. Manager, Regulatory Compliance, dan_cerkoney@tcenergy.com
Amy Willis, Director, Regulatory Compliance, amy_willis@tcenergy.com

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