

March 13, 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 1-2026-032-NOPV – RESPONSE TO NOTICE OF PROBABLE
VIOLATION and PROPOSED COMPLIANCE ORDER**

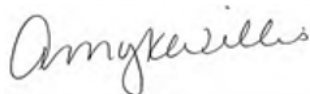
Mr. Burrough,

In response to the above-referenced Notice of Probable Violation and Proposed Compliance Order (Notice) issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA) on February 13, 2026, TC Energy, on behalf of ANR Pipeline Company, (ANR), respectfully requests an informal meeting pursuant to 49 U.S.C. § 60117(b)(1)(B) to discuss Item 1 in the Notice and resolve its concerns. TC Energy is optimistic that an informal meeting will allow the parties to appropriately address the issues raised by the Eastern Region in the Notice.

To preserve its rights, TC Energy is also submitting a Request for Hearing pursuant to 49 C.F.R. § 190.211 and as required, provides our Preliminary Statement of Issues. TC Energy hopes that a hearing will be unnecessary and that the parties can resolve this matter informally. TC Energy respectfully requests that PHMSA refrain from scheduling a hearing to provide the parties with sufficient time to attempt to informally resolve this Notice.

Please feel free to contact myself with any questions.

Respectfully,



Amy Willis
Director, US Regulatory
Compliance US Natural Gas

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY
ADMINISTRATION
OFFICE OF PIPELINE SAFETY**

_____)
In the Matter of)

ANR Pipeline Company,)

Respondent.)
_____)

CPF No. 1-2026-032-NOPV

**REQUEST FOR HEARING AND PRELIMINARY STATEMENT
OF ISSUES IN RESPONSE TO NOTICE OF PROBABLE
VIOLATION AND PROPOSED COMPLIANCE ORDER**

1. Request for Hearing

Pursuant to 49 C.F.R. §§ 190.208(b)(4), TC Energy, on behalf of ANR Pipeline Company (ANR), respectfully requests an in-person hearing to discuss the Notice of Probable Violation and Proposed Compliance Order (Notice) that the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued on February 12, 2026, in the above-captioned proceeding.

2. Preliminary Statement of Issues

TC Energy respectfully contests the allegation of violation contained in Item 1 of the Notice and the proposed compliance order. TC Energy intends to raise the following issues at the informal hearing.

1. Whether the allegation of violation is supported by the facts and the evidence.
2. Whether PHMSA has met its burden of proof that a violation has occurred.
3. Whether ANR failed to perform annual master valve function tests in accordance with §192.12(b)(2) as alleged in the Notice.
4. Whether due to the configuration of the Muttonville wells, the master valves were required to be inspected in accordance with the provisions of API RP 1171 Section 9 as alleged in the Notice.
5. Whether the proposed compliance order is appropriate or should be modified or withdrawn.

TC Energy reserves the right to revise and supplement this Preliminary Statement of Issues, if necessary, based on any new information or argument provided by PHMSA in this matter. TC

Energy will be represented by counsel at the hearing.

3. Request for Agency Records

Pursuant to 49 U.S.C. § 60117(b)(1)(C), 49 C.F.R. § 190.212(c)(2), (c)(3), (c)(7), and the Chief Counsel's memo on "Revised Procedures for Determining the Contents of the Case File in Pipeline Safety Enforcement Proceedings" dated May 29, 2025, TC Energy respectfully requests that PHMSA provide all agency records pertinent to the matters of fact and law asserted in the Notice.

TC Energy respectfully requests that PHMSA release these agency records at the earliest possible date, but not to exceed 10 days prior to the hearing, so that TC Energy has a full "opportunity to offer facts, statements, explanations, documents, testimony or other evidence that is relevant and material to the issues under consideration[.]" and to fully and fairly "examine the evidence and witnesses presented by the other party" at the hearing, in accordance with 49 C.F.R. § 190.211(d)-(e). TC Energy reserves the right to ask the Presiding Official to compel the production of any agency records that PHMSA fails to release pursuant to the authority provided in 49 C.F.R. § 190.212(c)(2), (c)(3) and (c)(7).

Respectfully submitted,



Brianne K. Kurdock
Babst Calland
505 9th Street, NW, Suite 602
Washington, DC 20004
Office 202-853-3462
bkurdock@babstcalland.com
Counsel for TC Energy