

Via Electronic Mail

December 21, 2023

Mr. Gregory Ochs
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO 64106

**RE: Texas Eastern Transmission, LP Response
Notice of Probable Violation and Proposed Compliance Order
CPF 3-2023-033-NOPV**

Dear Mr. Ochs,

From March 28 through September 23, 2022, 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, inspected the two subsidiaries, namely, Texas Eastern Transmission, LP (TETLP) and Egan Hub Storage, LLC, across Alabama, Kentucky, Louisiana, Mississippi, Tennessee, and Texas.

On November 27, 2023, PHMSA issued the above referenced Notice of Probable Violation and Proposed Compliance Order (NOPV) alleging TETLP has committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR).

The following is a summary of PHMSA's concerns and ETNG's response to those concerns.

PHMSA Finding

1. § 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:**

(1)

(3) In the case of a lateral line which transports gas to a distribution center, at least 50 percent of the length of that line is in a Class 1 or Class 2 location;

Texas Eastern Transmission did not odorize a lateral that is located in a Class 3 area. This location of the lateral did not meet the exception from odorization for being in an area where it is at least fifty percent (50%) Class 1 or 2.

At the intersection of Highway 65 and Highway 412 near Columbia, Tennessee, a lateral (Line ID 15-F) branches off from Line 15 to a meter station. The length of that lateral is approximately 0.20 miles. The lateral is located entirely in a Class 3 area, according to Texas Eastern personnel, and does not meet the exception in § 192.625(b)(3). Therefore, the lateral must be odorized.

TETLP Response

TETLP recognizes the need to odorize Line 15-F per the requirements of § 192.625. TETLP has initiated scheduling activities for this project to ensure that the matter in subject is addressed in a timely manner. TETLP has also begun a deeper analysis of the Texas Eastern Transmission East (TET East) inspection system to identify any additional laterals that meet the requirement of odorization in accordance with §192.625(b)(3), and for any instances where odorization is required, take the necessary measures to do so in a timely manner.

Enbridge takes the alleged violations seriously and will work expeditiously to resolve them. Please call me on (713) 627-6601 if you need additional information.

Sincerely,



Peter Seydewitz

Director, Operational Excellence

GTM Engineering & Asset Management