



Enbridge

915 N. Eldridge Parkway, Ste. 1100
Houston, TX 77079

Via Electronic Mail

February 15, 2024

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

**RE: East Tennessee Natural Gas, LLC Response
Notice of Probable Violation and Proposed Compliance Order
CPF 3-2024-007-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 (U.S.C.), inspected the Enbridge_Gas_Spectra_East_Tenn inspection system (ETNG) which consists of two of Enbridge Inc.'s subsidiaries, namely, East Tennessee Natural Gas, LLC and Saltville Gas Storage Company, LLC, across Alabama, Georgia, North Carolina, Tennessee, and Virginia.

On January 18, 2024, PHMSA issued the above referenced Notice of Probable Violation and Proposed Compliance Order (NOPV) alleging ETNG 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. § 192.479 Atmospheric corrosion control: General.

(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

ETNG failed to provide protection against atmospheric corrosion by cleaning and coating each pipeline or portion of pipeline that is exposed to the atmosphere. Specifically, during the field inspection of Unit 6582, at or near milepost 30.9, the PHMSA inspectors observed bare

exposed pipe in a creek bed. While ENTG's latest atmospheric inspection, completed on September 29, 2021, identified this site as needing repair, ENTG did not initiate a project to repair this exposure. PHMSA's field observation, which was documented with photographic evidence, shows that ETNG failed to provide protection against atmospheric corrosion on its pipeline by cleaning and coating each portion of pipeline that is exposed to the atmosphere, in violation of § 192.479(a).

ETNG Response

ETNG reevaluated the exposed pipe located at milepost 30.9 to determine the remediation plan and completed remediation of the site on November 1, 2023.

2. § 192.705 Transmission lines: Patrolling.

(a) Each operator shall have a patrol program to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.

ETNG failed to maintain the right-of-way (ROW) at an appropriate level for the type of patrols that were being done. Specifically, ETNG solely conducted aerial patrols of its ROWs. During PHMSA's ROW inspections, inspectors observed 12 overgrown areas, with some areas having tree growth canopied over the pipeline.

Patrolling of ROWs is essential to help identify potential problems from third-party activities along the pipeline and observing for indications of leaks. The surface conditions of the ROW and adjacent areas cannot be adequately inspected by aerial patrolling when those areas are obstructed by an overhanging tree canopy. No other methods of patrolling were conducted in these locations at the time of the field inspection. Therefore, by failing to adequately maintain its ROWs, ETNG failed to follow § 192.705(a).

ETNG Response

ETNG has cleared 8 locations of the 12 overgrown areas with the remaining four locations scheduled to be cleared in 2024. ETNG has confirmed that ROW for the remaining four locations are currently visible by aerial patrolling and will perform alternative patrol of ROW upon return of foliage until clearing activities are completed.

3. § 192.750 Launcher and receiver safety.

Any launcher or receiver used after July 1, 2021, must be equipped with a device capable of safely relieving pressure in the barrel before removal or opening of the launcher or receiver barrel closure or flange and insertion or removal of in-line inspection tools, scrapers, or spheres. An operator must use a device to either: Indicate that pressure has

been relieved in the barrel; or alternatively prevent opening of the barrel closure or flange when pressurized, or insertion or removal of in-line devices (e.g. inspection tools, scrapers, or spheres), if pressure has not been relieved.

ETNG failed to maintain the pig trap safety devices in working order. Specifically, during field inspections, PHMSA inspectors noted at seven locations safety chain/cable deficiencies. The safety chain/cable is used to prevent the pig trap's door from being opened without first removing a plug to ensure that pressure has been relieved within the pig trap. These safety chain/cable deficiencies would allow the pig trap door to be opened without first removing the plug, posing safety concerns. Following PHMSA's inspection, ETNG has completed repairs to the safety chain/cable at each location. By failing to maintain the safety chain/cable at seven locations, ETNG failed to follow § 192.750.

ETNG Response

ETNG has revised the existing procedure to include additional details on maintenance of pig trap safety devices and will conduct training of its staff.

ETNG is committed to the continual improvement of its safety processes and procedure. The company takes the alleged violations seriously and will work expeditiously to resolve them. Please call me at (713) 627-6601 if you need additional information.

Sincerely,



Peter Seydewitz

Director, Operational Excellence

GTM Engineering & Asset Management