



David Stafford
Manager
U.S. Pipeline Compliance

tel 715 394 1511
cell 218 591 7247
david.stafford@enbridge.com

Enbridge Energy,
Limited Partnership
119 North 25th Street E
Superior, WI USA

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Sent Via Electronic Transmission

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

Re: CPF 3-2024-016-NOPV

Dear Mr. Ochs:

From February 14 to July 27, 2023, 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 Enbridge Pipelines (Southern Lights), L.L.C.'s ("Enbridge") Line 13 Manhattan Terminal near Manhattan, Illinois. As a result of the inspection, it is alleged that Enbridge has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

1. § 195.426 Scraper and sphere facilities.

No operator may use a launcher or receiver that is not equipped with a relief device capable of safely relieving pressure in the barrel before insertion or removal of scrapers or spheres. The operator must use a suitable device to indicate that pressure has been relieved in the barrel or must provide a means to prevent insertion or removal of scrapers or spheres if pressure has not been relieved in the barrel.

At the time of the field inspection, the lead PHMSA inspector observed that Enbridge's launcher at the Line 13 Southern Lights Manhattan Terminal was equipped with a relief device that was not capable of safely relieving pressure in the barrel before insertion or removal of scrapers or spheres in-service. In failing to maintain the safety relief device in a functional manner, the operator failed to comply with § 195.426.

Enbridge Response:

Enbridge has engaged the internal OMM owner and has developed amendments to raise awareness to recognize these closure devices in the field. Specifically addressing these devices in the OMM requirements and alerting field staff to their purpose and presence on traps will enhance the process safety while performing trap related activity. Once the OMM amendment is complete, the change will be communicated addressing the regulatory requirements to all qualified for the safe operation of traps.

Sincerely,

David Stafford
Manager, US Pipeline Compliance