

WARNING LETTER

VIA ELECTRONIC MAIL TO: cynthia.hansen@enbridge.com;
michael.koby@enbridge.com; peter.seydewitz@enbridge.com

June 6, 2025

Cynthia Hansen
EVP & President Texas Eastern Transmissions, LP
915 North Eldridge Parkway, Suite 1100,
Houston, TX 77079

CPF 3-2025-025-WL

Dear Ms. Hansen:

From March 26 to October 25, 2024, 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.), conducted an inspection of the Texas Eastern North Gas Transmission system of Enbridge, Inc. (“Enbridge”) in Ohio, Pennsylvania, New Jersey, West Virginia, and New York.

As a result of the inspection, it is alleged that Enbridge committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violations are:

- 1. § 192.603 General provisions.**
 - (a)**
 - (b) Each operator shall keep records necessary to administer the procedures established under § 192.605.**

Enbridge failed to properly manage its computerized records necessary to administer the procedures required by § 192.605 when it transitioned to a new work management system (WMS).

Starting in calendar year 2021, Enbridge began the process of transitioning from its existing Systems, Applications, and Products (SAP) to its new asset management and work management

system, Maximo. As part of the process, Enbridge migrated electronic records from SAP to Maximo. The data transfer included records from annual and bi-annual valve inspections, remote control valve inspections, over-pressure protection switch devices, pressure relief valves, and pressure limiting regulators. During the inspection PHMSA requested follow-ups for several missing or incomplete records, and records with inspection dates that exceeded maximum re-inspection intervals for inspection years 2021-2023. Enbridge provided additional information for several of the identified missing records and provided updated inspection dates. However, Enbridge was unable to locate or provide missing information for approximately 74 inspection records. Enbridge confirmed that an error resulted in Work Order specifications not populating, causing the data to be missing from certain inspection records. Enbridge's inability to locate certain inspection records or provide specific inspection record data resulted in a failure to properly manage its electronic records in accordance with Part § 192.603(b).

2. § 192.709 Transmission lines: Record keeping.

Each operator shall maintain the following records for transmission lines for the periods specified:

(a)

(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.

Enbridge failed to properly maintain “as found” and “as left” settings records from inspections and tests of overpressure safety devices to ensure they are functioning properly and are in good mechanical condition and adequate. Enbridge's recent migration from SAP to a Maximo work management database system included the transfer of inspection records for over-pressure protection switch devices, pressure relief valves, and pressure limiting regulators. A review of the post-migration records revealed that several of those records were lacking “as found” and “as left” information presumably due to an error resulting in the Work Order specifications not populating. Recording and periodically reviewing “as found” and “as left” settings demonstrate if a set point for an overpressure safety device is drifting and not functioning properly. Enbridge's failure to maintain a record of each inspection and test of overpressure safety devices conducted pursuant to § 192.739, including “as found” and “as left” settings, was not in accordance with § 192.739, and their retention is required by § 192.709(c).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024 the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023 the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023 the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violation

occurring on or after May 3, 2021 and before March 21, 2022 the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021 the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021 the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Enbridge being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 3-2025-025**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Sincerely,

Dave Barrett
Acting Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

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