



U.S. Department of Transportation
Pipeline and Hazardous Materials
Safety Administration

8701 S. Gessner, Suite 630
Houston TX 77074

NOTICE OF AMENDMENT

ELECTRONIC MAIL - RETURN RECEIPT REQUESTED

August 11, 2021

Rodney J. Sailor
President & CEO
Enable Gas Transmission, LLC
499 West Sheridan, Suite 1500
Oklahoma City, Oklahoma 73102

CPF 4-2021-046-NOA

Dear Mr. Sailor:

From December 21, 2020 to March 2, 2021, representatives 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 investigation following the reportable natural gas release on Enable Gas Transmission, LLC's (Enable) 16-inch Line A-South that occurred on December 18, 2020, in Caddo Parish, Louisiana. The investigation included a review of Enable's operations and maintenance records and procedures.

On the basis of the investigation, PHMSA has identified an apparent inadequacy found within Enable's procedures, as described below:

1. § 192.613 Continuing surveillance.

- (a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.**
- (b) If a segment of pipeline is determined to be in unsatisfactory condition but no immediate hazard exists, the operator shall initiate a program to recondition or phase out the segment involved, or, if the segment cannot be reconditioned or phased out, reduce the maximum allowable operating pressure in accordance with § 192.619 (a) and (b).**

Enable's operation and maintenance (O&M) procedures are inadequate because they do not have a procedure to initiate programs to address segments of pipeline that have been determined to be in an unsatisfactory condition, but remain non-immediate hazards in accordance with § 192.613. Enable's O&M procedures do not include a process to analyze integrated pipeline data over time to detect changes that could affect the overall condition of the pipeline. Enable's current procedures appear to react following a one-time event, and are not based on a continuing surveillance of the operator's facilities.

Enable's Operation and Maintenance Plan, Continuing Surveillance, OM-202, Section A: Requirements (Revision Date: 8/27/2020), contains inadequate language for initiation of continuing surveillance programs. Prior to the reportable incident, five known dresser coupling leaks were found on this same line that experienced the reportable incident, Line A-South, in calendar years 2016, 2019, and 2020. The leaks were documented on Enable's record titled, "Leak Cause and Analysis History, Line: A-SOUTH Team: 711 Date Range: >= 01/01/2015."

Enable does not have a program that specifically addresses the potential threat from dresser coupling leaks. Enable has only provided comments from its "Natural Gas Integrity Management Program Evaluation for calendar year 2017" and "Repair, Work on Dresser Coupled Pipelines" (OM-221, Version 3, 7-28-2020). Enable did not provide any evidence demonstrating the initiation of continuing surveillance programs addressing areas outside of its High Consequence Areas (HCA); Enable only presented information for areas under its Integrity Management Program. The lack of analysis and data integration to establish reconditioning or replacement programs for areas outside an HCA is a result of the deficient continuing surveillance procedure.

Enable must amend its O&M procedure for Continuing Surveillance to include a process to integrate and analyze data and provide a process to recondition or phase out those segments identified as unsatisfactory.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this

Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Enable maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Mary L. McDaniel, P.E., Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2021-046-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Mary L. McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*