

September 9, 2021

Mary McDaniel
Director, Southwest Region
PHMSA Pipeline Safety
8701 S. Gessner Dr.
Suite 1110
Houston, TX 77074

Subject: Enable Gas Transmission, LLC - Response to PHMSA Notice of Amendment CPF 4-2021-046

Dear Ms. McDaniel,

This letter, along with the attachment, constitutes the response of Enable Gas Transmission, LLC (EGT) to the Notice of Amendment issued by Pipeline and Hazardous Materials Safety Administration (PHMSA) on August 11, 2021. On the bases of PHMSA's investigation performed from December 21, 2020 to March 2, 2021, apparent inadequacies were identified related to Enable's Continuing Surveillance procedure. Below is an excerpt from Notice of Amendment CPF 4-2021-046.

Item 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.

Item 1 - Resolution:

Enable's Operations & Maintenance Manual, OM-202 Continuing Surveillance procedure has been revised to specify the requirements for the implementation of a corrective action program when a facility is determined to be in unsatisfactory condition. The revised procedure document is attached for review as an exhibit.

Through the actions specified in this letter, we believe Enable has fulfilled the requirements of this Notice of Amendment. If you have any questions concerning the information contained in this response, please do not hesitate to contact me.

Sincerely,



Cary Watson
Vice President, Safety, Environmental and Technical Programs
Enable Midstream Partners, LP

Attachments/Exhibits:

1. Operations & Maintenance Procedure - OM-202 Continuing Surveillance