



January 10, 2023

Bryan Lethcoe
Director, Southwest Region
Pipeline and Hazardous Material Safety Administration

Re: CPF 4-2022-036-NOPV: Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order from Sabine System Inspection.

Dear Mr. Lethcoe:

EnLink Midstream received your letter dated December 14, 2022, pertaining to a NOPV, Proposed Civil Penalty and Proposed Compliance Order for an inspection done by PHMSA on the EnLink Sabine pipeline system. With this letter we would like to provide an EXPLANATION for the findings and submit more documentation.

PHMSA Findings:

As a result of the inspection, it is alleged that Enlink has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (C.F.R.). The item inspected and the probable violation is:

ITEM 1. § 192.467 External corrosion control: Electrical isolation.

(c) Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically isolated from metallic casings that are a part of the underground system. However, if isolation is not achieved because it is impractical, other measures must be taken to minimize corrosion of the pipeline inside the casing.

(a) Enlink failed to ensure its Sabine pipeline system was electrically isolated from metallic casings at 17 locations. Enlink provided a cathodic protection *Survey Report* for calendar years 2016 through 2020. The report identified 44 unique cased crossings with a metallic short. At the time of the inspection, Enlink had not initiated action on 17 of the 44 locations to clear the shorted casings or to minimize corrosion on the carrier pipeline inside the casing in accordance with § 192.467. Enlink determined that the remaining 27 locations were cleared.

(b) PHMSA reviewed EnLink's *Corrosion Control Manual, CORR-003: Testing for Shorted Casings and Valve Boxes* (Version 1.0, Current Review: 2/26/2019) which state:

Documentation

A copy of the test data on the appropriate Company form should be filed in the PCS file.

- If the casing is shown as newly shorted by the Panhandle Eastern test, and an attempt to clear the short has not been made, the casing should be reported as a deficiency and entered into the appropriate work management system within two weeks of discovery. The attempt, if practical, must be made within 6 months, or a deferral letter should be written.

(c) For the 17 shorted locations Enlink failed to provide records that these deficiencies were entered into the appropriate work management system within two weeks of discovery, that an attempt was made to correct the deficiencies, or that a deferral letter was drafted for any of the shorted casings. For the 27 cleared casings, Enlink failed to identify whether the short was metallic or dielectric.

(d) On January 13, 2022, Enlink updated its manual, *Corrosion Control Manual, CORR-003: Testing for Shorted Casings and Valve Boxes* (Version 2.0, Current Review: 1/13/2022). This updated procedure eliminated the requirement to report deficiencies within two weeks and to make attempts to correct deficiencies within six months. This procedure fails to specify how and at what intervals Enlink will monitor shorted casings, what corrective actions are in place to correct the deficiencies to ensure the pipeline is protected to minimize corrosion. Enlink must revise its procedures to include a process to monitor shorted casings to ensure the shorted casings are not a threat to the public safety.

(e) Therefore, Enlink failed to ensure its Sabine pipeline system was electrically isolated from metallic casings at 17 locations in accordance with § 192.467(c).

EnLink Response:

In regard to paragraph (a) above: Further documentation was located showing 5 of the 17 casings had been previously filled with wax. The original count of 44 were possible shorted casings but were not confirmed at that time. Of which 27 cleared. The remaining 17 needed action at the time of the audit. we found documents of another 5 remediated with wax and 1 tested clear that was suspected shorted in 2020. That leaves 11 remaining. EnLink is diligently working on addressing the remaining 11 shorted casings

In regard to paragraph (b) above: After reviewing the procedure in the EnLink Corrosion Manual and reviewing the requirements in Part 192, it was determined there was no reason to have specified a time period to make the corrections. Hence, we have updated our procedures (Version 2.0 revision 1/3/22) to be consistent with the rule requirements. See attachment #2

In regard to paragraph (c) above: These shorted casings were inherited from previous Operator. It is not practical to enter that info upon acquisition within 2 weeks. As soon as EnLink determined they were shorted it was entered in the work order system. The rule does not require to identify dielectric, and there is no definition for dielectric in the rule.

The EnLink Corrosion Manual was reviewed and updated to correct these requirements. For the 27 cleared casings, EnLink did identify they are metallically not shorted per the rule.

In regard to paragraph (d) above: EnLink is currently and at the time of the inspection monitoring shorted casings with a gas detector per the interval consistent with the patrolling and leak survey procedure (ENL-GOM-00029). In the past this process has always been an accepted method to monitor the casings by PHMSA and LDNR. We have updated our procedure to specify monitoring intervals for shorted casings to ensure the shorted casings are not a threat to the public safety. Please see attachment #3.

EnLink is diligently working on clearing the remaining shorted casings and taking measures to minimize corrosion of the pipeline inside the casing on the Sabine system.

In regard to paragraph (e) above: EnLink disagrees with PHMSA's findings, but EnLink was, and is, monitoring the casings for the safety of the public. Confirmed metallicly shorted to date is 15 regardless of wax fill status, there are 11 casings metallicly shorted that have not been remediated by wax fill. There are a total of 8 casings currently filled with wax regardless of the current casing status as per history records, 4 shorted that are wax filled and 4 clear that are wax filled. Of the 8 casings that are listed as wax filled, vendor fill documents have been found for 5, the remaining 3 listed as wax filled was documented as wax filled in the CP history records. Documentation is attached.

Attachments:

1. Updated documentation showing the current number of shorted casings existing on the Sabine pipeline system.
2. In regard to Item 1 of the Proposed Compliance Order, a draft copy of the revisions to the EnLink Corrosion Manual.
3. ENL-GOM-00029 – Patrolling and Leak Surveys V2.0

Conclusion

EnLink is committed to comply with all applicable regulations and safety is a number one priority.

Sincerely,



Cordell Theriot
Sr. DOT Compliance Specialist

Cc: Mike LeBlanc, Aaron Wimberley, Prasanna Swamy, Keith Charpentier and Evan Savant.