



April 27, 2023

By Electronic Mail only

Mr. Bryan Lethcoe
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
8701 South Gessner, Suite 630
Houston, Texas 77074

**Re: CPF 4-2023-030-WL
Warning Letter**

Dear Mr. Lethcoe:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) performed a field site construction inspection on Enable Gulf Run Transmission, LLC's (Enable) Gulf Run pipeline project from May 2-5 and June 21-23, 2022. Then, on January 12, 2023, Enable received a Warning Letter from PHMSA alleging four (4) probable violations related to that inspection. While Enable understands that no reply to a Warning Letter is required, it does desire to correct the record regarding inaccuracies contained in the same and, most importantly, correct inappropriate or speculative conclusions regarding the integrity of the pipeline.

Below you will find each of the four PHMSA probable violations contained in the Warning Letter as stated by PHMSA (in bold), followed by Enable's response. You will note that the Exhibits referenced in the response are attached separately. This is because all (with the exception of the final Exhibit) contain confidential business information and confidential security information that is protected from public disclosure under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. Enable has marked each such confidential Exhibit with the notation: "CONFIDENTIAL – Protected from Disclosure under FOIA 5 U.S.C. § 552." Should PHMSA receive a FOIA request for this information, the Agency is required to notify Enable and provide the Company with an adequate opportunity to substantiate its claim, prepare redactions, and/or object, if warranted.

Enable appreciates the ability to correct the record and PHMSA's review and consideration of the same. The Company shares PHMSA's commitment to pipeline safety, public safety, and pipeline integrity. Should you have any questions or concerns please contact me at (713) 989-7460 or via email at eric.amundsen@energytransfer.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Amundsen', written over a light blue horizontal line.

Eric Amundsen
Group Sr. Vice President – Gas Operations

cc: Dennise Loya, Director – Engineering Stds & Integrity
Heidi Slinkard Murchison, Chief Counsel

PHMSA Warning Letter Item 1:

§ 192.225 Welding procedures.

(a) Welding must be performed by a qualified welder or welding operator in accordance with welding procedures qualified under section 5, section 12, Appendix A or Appendix B of API Std 1104 (incorporated by reference, see § 192.7), or section IX of the ASME Boiler and Pressure Vessel Code (ASME BPVC) (incorporated by reference, see § 192.7) to produce welds meeting the requirements of this subpart. The quality of the test welds used to qualify welding procedures must be determined by destructive testing in accordance with the applicable welding standard(s).

(b) Each welding procedure must be recorded in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.

Enable failed to perform welding in accordance with the qualified welding procedures as required by § 192.225(a) and (b) during construction of the Enable Gulf Run Pipeline.

On May 4, 2022, PHMSA observed welding on a field joint at mile post marker 29. When questioned by PHMSA inspectors, the welders were not able to identify the welding procedure being used or describe the welding parameters they were required to follow as specified by the procedure. Specifically, the welders were unable to identify any of the welding parameters specified by the qualified welding procedure WPS GRP-M-WPS1, such as electrode specifications and sizes, pre-heat temperature requirements, voltage, amperage, and travel speed. Without knowledge of these parameters, the welders could not have been performing the welds according to the qualified welding procedure. Since Enable's welding operators did not follow a qualified welding procedure, Enable cannot verify that the completed welds have the required strength and mechanical properties.

Therefore, Enable failed to perform welding in accordance with the qualified welding procedures as required by § 192.225(a)

Enable Response to Warning Letter Item 1:

Warning Item 1 is inaccurate and unfounded. Enable did perform welding in accordance with the qualified welding procedures and retained records of the welding procedure which was being followed when PHMSA observed the same.

Enable's Shielded Metal Arc Welding (SMAW) procedures were qualified to the requirements specified in section 5 of *API 1104 (20th edition)* and welders were qualified to the requirements of Section 6 of the same. Each welder was provided a copy of their certification along with copies of the welding procedures to which they were qualified. Compliant welding procedures and welder qualifications were provided to and reviewed by PHMSA's inspector during HQ and field visits associated with this Warning Letter and no issues with either were identified. See **Exhibit A**, Welding Procedures, and **Exhibit B**, Welder Qualifications.

Welding inspection was performed by qualified welding inspectors on these welds and recorded on the *Welding Inspection Field Report* (see **Exhibit C**) and the *Daily Inspection Report Welding* (see **Exhibit D**). Welding parameters captured and recorded by the qualified welding inspector (e.g., amps, volts, travel speed, and preheat temp), were within the acceptable limits of the welding procedure.

As reflected above, welding procedures and welders utilized on Enable's Gulf Run project met the requirements set forth by § 192.225 (a) and (b). Therefore, the integrity of the weld in terms of strength and mechanical properties was not compromised as alleged in Warning Letter Item 1.

PHMSA Warning Letter Item 2:

§ 192.303 Compliance with specifications or standards.

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

Enable failed to follow its written specification for excavating in accordance with § 192.303 while installing the Gulf Run transmission line in the ditch. Enable's construction specification document, CS-055: Excavation, includes specifications for the minimum width of the ditch as well as the spoil bank setback from the ditch. Section 1.0 states that "[a]dherence to this specification is required in an effort to ensure the safety of all employees and Contractors of the Company."

During inspection of the Enable Gulf Run Pipeline on May 4, 2022, PHMSA observed pipe laid in a ditch between mile markers 28 and 29 that did not meet the width specifications required by CS-055. The Enable specification states the minimum width requirement in section 2.2.2: "Unless otherwise specified by Company, the ditch shall be excavated to a width of not less than twelve inches (12") greater than nominal diameter of the pipe." However, the sides of the excavated ditch were bearing against the pipe, so the ditch was not 12 inches greater than the pipe diameter. Failure to comply with this specification may result in damage to the pipeline and coating.

Section 2.2.2 of CS-055 requires that the edge of the excavated spoil bank be no closer than two feet from the edge of the pipe ditch. During the PHMSA inspection on June 22, 2022, the spoil bank setback was less than two feet from the edge of the pipe ditch. Failure to comply with this specification may result in rocks and debris falling back into the ditch potentially damaging the pipeline and coating or potentially compromising the required depth of cover by reducing the depth of the ditch before lowering.

Therefore, Enable failed to follow its written specification for excavating in accordance with § 192.303 while installing the Gulf Run transmission line in the ditch.

Enable Response to Warning Letter Item 2:

PHMSA is correct that the referenced Enable Specification, CS-055 Excavation (**Exhibit E**), provides the minimum required width for ditches; however, it does not specify that the pipe shall be laid at the centerline of the ditch. Although efforts are made to ensure even spacing on either side of the pipe, when possible, there are environmental conditions and construction restraints that may result in the pipe not being laid in the center at times. This is why there is no procedural requirement in CS-055 regarding the location of the pipe in the ditch, but instead a requirement that the ditch be 12" wider than the nominal diameter of the pipe. Further, there is no indication in PHMSA's Case File of inspection or measurement of both sides of the ditch during the field audit at said locations to support PHMSA's statement that the ditch was not 12" wider than the pipe or that the sides of excavated ditch were "bearing against the pipe". Even more, PHMSA's conclusion, if it were accurate, that the fact that the pipe is near one side of the ditch results in a ditch width that is not 12" greater than the diameter of the pipe completely ignores that the entire ditch must be measured, not just one side of the ditch to one side of the pipe. Enable maintains that the ditch met the minimum width requirements specified at the time of excavation and lowering.

With regard to the allegations regarding the spoil bank, Enable agrees that reasons for a procedure indicating the initial distance between the edge of the excavation and the edge of the spoil bank include, among other things, to minimize the potential for rocks and debris to fall into the excavation and damage the coating or impact depth of cover. However, additional reasons include that this distance allows sufficient buffer generally to account for rain, wind, gravity, and other impacts to the spoil pile without extensive impact from the same on the excavation or pipe. In this case, weather conditions during the two weeks between excavation activities and the date of the field audit resulted in shifting of the ditch walls and sluffing of the spoil pile which decreased the initial distances between the two. Nevertheless, there was no indication during the inspection that the coating or depth of cover were impacted by debris or that the debris pile was not the required distance from the edge of the ditch when it was initially placed there. Further, there is no evidence to support that either were an issue in PHMSA's Case File.

Therefore, Enable did follow its excavation specification, C-055 Excavation, as required by § 192.303. Additionally, Enable ensured the integrity of the protective coating on the entire pipeline by having completed visual inspection, holiday detection, and Direct Current Voltage Gradient (DCVG) Survey. Damages to the coating and/or pipeline, had any occurred, would have been identified and remediated during these inspection activities, but there was no indication during the audit or in PHMSA's Case File that any issues occurred, let alone occurred and were not remediated. Therefore, Enable disagrees with the allegations made and conclusions drawn in Warning Item 2.

PHMSA Warning Letter Item 3:

§ 192.235 Preparation for welding.

Before beginning any welding, the welding surfaces must be clean and free of any material that may be detrimental to the weld, and the pipe or component must be aligned to provide the most favorable condition for depositing the root bead. This alignment must be preserved while the root bead is being deposited.

Enable failed to properly align the pipe to provide the most favorable condition for depositing the root bead during the Enable Gulf Run Pipeline construction project as required by § 192.235. Enable's written specification CS-100, section 2.8.2.a states that "the offset between pipe surfaces of the same nominal wall thickness should not exceed 1/16 inch." During a PHMSA inspection on June 22, 2022, the alignment for welds of the 42-inch, 0.600-inch wall pipe exceeded the specified maximum offset of 1/16 inch.

In addition, Enable failed to follow its written specification for pipe alignment in accordance with § 192.303. PHMSA inspectors observed a 42-inch, 0.600-inch wall pipe being directly welded to 42-inch, 0.720 wall pipe. The Enable CS-100 specification requires that pipes with wall thickness differences greater than 3/32 inch must be joined using a transition piece.

Enable also failed to conduct adequate visual inspections to ensure that the welding is performed in accordance with the welding procedure as required by § 192.241(a). When PHMSA notified Enable of the excessive misalignment, Enable personnel were not visually inspecting the offset and seemed unaware of their own specifications to limit the offset, or the requirement to use a transition piece for joining pipes with wall thicknesses that differ by more than 3/32 inch.

The Automated Ultrasonic Testing (AUT) nondestructive examination also detected the excessive misalignment. The AUT results showed excessive offset (high-low) through geometric indications. Section 192.243(c) states that “[p]rocedures must be established for the proper interpretation of each nondestructive test of a weld to ensure acceptability of the weld under § 192.241(c).” When PHMSA raised the issue during the inspection, the AUT technician responded that evaluating or reporting of high-low was not required for this project. Therefore, Enable failed to follow its misalignment specifications on the Gulf Run Pipeline construction project.

Enable Response to Warning Letter Item 3:

The referenced Enable Specification, *CS-100 Standard Welding Specifications (Exhibit F)*, does specify a maximum offset of 1/16”, however the requirement does not end there. Instead, *CS-100* continues by stating that, “Any greater offset shall be brought to the attention of the Inspector and it shall be his responsibility to resolve the problem.” Per section 7 of *API 1104 (20th edition)*, “For pipe ends of the same nominal thickness, the offset shall not exceed 1/8 in” with no additional corrective actions required. The offset referenced in this item was measured to exceed Enable’s tolerance by 1/32” but was within the 1/8” allowance specified in *API 1104* and therefore no additional corrective measures were taken. Since the completed weld was compliant with *API 1104*, the integrity of the weld was not affected.

Further, *CS-100* allows for the use of a transition piece **OR** “to have the end of the thicker pipe prepared as detailed in...*Drawing A-ST-PS-31, Design Guidelines for Weld Connections for Unequal Wall Thickness Components*” (see **Exhibit G**). For the weld referenced above, Enable transitioned the pipe end in compliance with *Drawing A-ST-PS-31* in order complete a satisfactory weld (see **Exhibit H**).

Regarding the inaccurate allegation that AUT “detected the excessive misalignment”, and as previously submitted to PHMSA in the Closing Summary dated May 5, 2022, Enable asserts that “Although the utilization of AUT can identify high/low, using this method cannot accurately provide measurements and therefore is not the correct inspection method for identifying high-low/misalignment. In order to determine whether there is a presence of high-low/misalignment, it needs to be inspected and addressed during the fit-up process prior to welding.” Furthermore, review of the AUT logs did not show welds identified as having “excessive misalignment”, as this is not an anomaly that is captured by AUT or measured for disposition during NDE as previously explained. Nonetheless, Enable inspected for the presence of misalignment and if it existed it would have been identified during the fit up of pipe joints. If misalignment had been identified, corrective actions would have been implemented prior to welding. Therefore, the factual allegations contained in Warning Item 3 are inaccurate.

PHMSA Warning Letter Item 4:

§ 192.461 External corrosion control: Protective coating.

(a)

(c) Each external protective coating must be inspected just prior to lowering the pipe into the ditch and backfilling, and any damage detrimental to effective corrosion control must be repaired.

Enable failed to properly inspect the protective coating just prior to lowering the pipeline in the ditch as required by § 192.461(c). To conduct this inspection, Enable uses an electronic jeeping device designed to detect defects or holidays in the pipeline coating. This device must be properly calibrated, and the detection threshold set based on the thickness of the pipeline coating for coating defects to be discovered and repaired.

During the inspection, Enable's technicians performing the inspections could not provide the specifications for calibrating the jeeping device or state any of the factors, such as coating thickness, required to properly set the detection threshold. The manufacturer's instruction manual for the SPY Model 780 jeep used by Enable specified two methods for calibrating, properly setting the detection threshold and testing the device to ensure coating holidays were being detected. Technicians performing the inspections had not completed either method resulting in the possibility that defects in the pipeline coating were not being detected and repaired. Failure to detect and repair pipeline coating defects could result in external corrosion and corrosion-related failures of the pipeline.

Therefore, Enable failed to properly inspect the protective coating just prior to lowering the pipeline in the ditch as required by § 192.461(c).

Enable Response to Warning Letter Item 4:

Enable did ensure the integrity of the coating on pipe by performing inspection prior to lowering the pipe into the ditch by using a two-step approach. The first step was a visual inspection performed by a NACE-certified coating inspector. These inspections were logged on the *Weld Joint Coating Log* (see **Exhibit I**), copies of which were made available to the inspector. The second step was an inspection performed using a holiday detector (SPY brand) via a jeeping process. On the same *Weld Joint Coating Log*, details of the holiday detector inspection were captured and recorded, including the voltage utilized. This log was completed throughout the day by the foreman's assistant and was signed by the foreman. In addition to the visual inspection and holiday detection performed on the entire pipeline, Enable also evaluated the entire pipeline by a Direct Current Voltage Gradient (DCVG) Survey, therefore exceeding the requirements of § 192.461(c).

Before jeeping is performed, the holiday detector is field-calibrated by the foreman's assistant or designee. Calibration is typically completed first thing in the morning and midway through the shift. The field calibration is captured and recorded on the *Weekly Jeep Calibration Log* (see **Exhibit J**). Once the calibration is complete and all settings are verified, the holiday detector is then provided to the laborer.

The process of jeeping is performed by the laborer under the supervision of the foreman with the assistant foreman completing documentation as needed. During the field audit visit, the PHMSA inspector questioned only the laborer who was performing the jeeping about calibration (see **Exhibit K**). Since the laborer does not calibrate the equipment, he was unable to provide information requested and the inspector did not question personnel who had completed the calibration and are familiar with the requirements. Yet evidence that field calibration in fact occurred is found in **Exhibit J** which reveals that during the pendency of the audit calibration occurred twice per day.

PHMSA's "Closing Summary of Inspection of Enable Gulf Run" for the field audit completed on May 5, 2022, requested the "Written Procedure that Referenced Standard for Jeeping Calibration." Enable provided both CS-053, *Coating of Below Ground Steel Piping* (**Exhibit L**), and the SPY Holiday detector manual to PHMSA (**Exhibit M**). Field calibration records were never requested during the HQ or field audit visits; however, they remain available for review.

Therefore, calibration did occur as required and, with the completion of visual inspection, holiday detection, and DCVG, Enable did in fact properly inspect the protective coating as required by § 192.461(c).