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January 15, 2024

Mr. Bryan Lethcoe
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
8701 S. Gessner Rd, Suite 630
Houston, Texas 77074

Via email: bryan.lethcoe@dot.gov

Subject: Enable Gas Transmission, LLC (EGT) Response to Notice of Amendment CPF 4-2023-046-NOA

Dear Mr. Lethcoe,

This letter constitutes the response of Enable Gas Transmission, LLC (EGT) to the Notice of Amendment (NOA), CPF 4-2023-046, issued by PHMSA on October 18, 2023, and received by the Company on October 18, 2023.

Please note that the attached exhibits to this submission 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. As such, those exhibits are marked "**Confidential**." Should PHMSA receive a FOIA request for this information, the Agency is required to notify Energy Transfer and provide the Company with an adequate opportunity to substantiate its claim, prepare redactions, and/or object, if warranted.

Alleged Inadequacies

1. ***§ 192.605 Procedural manual for operations, maintenance, and emergencies.***

(a). . . .

(b) ***Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.***

(1) ***Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.***

§ 192.515 Environmental protection and safety requirements.

(a) ***In conducting tests under this subpart, each operator shall insure that every reasonable precaution is taken to protect its employees and the general public during the testing. Whenever the hoop stress of the segment of the pipeline being tested will exceed 50 percent of SMYS, the operator shall take all practicable steps to keep persons not working on the testing operation outside of the testing area until the pressure is reduced to or below the proposed maximum allowable operating pressure.***

Enable's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(1). Specifically, Enable's pressure testing procedure failed to adequately detail all reasonable precautions that may be taken to protect employees and the general public during the testing in accordance with § 192.515(a).

C4.0105-Pressure Testing Execution, revision date April 1, 2022, Section 4.1 Safety, failed to provide sufficient detail regarding safe distance. Enable listed a minimum distance of fifty feet, but failed to detail how much additional *distance might be necessary, and the analysis required to establish a safe distance on pipelines where the listed minimum distance does not suffice in accordance with § 192.515(a).*

Therefore, Enable's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(1). Enable must revise its procedures as specified above.

2. *§ 192.607 Verification of Pipeline Material Properties and Attributes: Onshore steel transmission pipelines.*

(a). . . .

(c) *Verification of material properties and attributes. If an operator does not have traceable, verifiable, and complete records required by paragraph (b) of this section, the operator must develop and implement procedures for conducting nondestructive or destructive tests, examinations, and assessments in order to verify the material properties of aboveground line pipe and components, and of buried line pipe and components when excavations occur at the following opportunities: Anomaly direct examinations, in situ evaluations, repairs, remediations, maintenance, and excavations that are associated with replacements or relocations of pipeline segments that are removed from service. The procedures must also provide for the following:*

(1) *For nondestructive tests, at each test location, material properties for minimum yield strength and ultimate tensile strength must be determined at a minimum of 5 places in at least 2 circumferential quadrants of the pipe for a minimum total of 10 test readings at each pipe cylinder location.*

(2) *For destructive tests, at each test location, a set of material properties tests for minimum yield strength and ultimate tensile strength must be conducted on each test pipe cylinder removed from each location, in accordance with API Specification 5L.*

(3) *Tests, examinations, and assessments must be appropriate for verifying the necessary material properties and attributes.*

(4) *If toughness properties are not documented, the procedures must include accepted industry methods for verifying pipe material toughness.*

(5) *Verification of material properties and attributes for non-line pipe components must comply with paragraph (f) of this section.*

Enable's written procedures for conducting nondestructive or destructive tests, examinations, and assessments in order to verify the material properties of aboveground line pipe and components, and of buried line pipe and components when excavations occur were inadequate to assure safe operation of a pipeline facility in accordance with § 192.607(c). Specifically, Enable's procedure, I.43 Material Verification, (Rev. 1 - July 1, 2021), Section 7.2 Track Opportunistic Digs, failed to include sufficient details regarding opportunistic digs. The coordination between various work groups and responsibilities that groups have is not discussed with adequate specificity.

Therefore, Enable's written procedures for conducting nondestructive or destructive tests, examinations, and assessments in order to verify the material properties of aboveground line pipe and components, and of buried line pipe and components when excavations occur were inadequate to assure safe operation of a pipeline facility in accordance with § 192.607(c). Enable must revise its procedure to describe the approach used to track locations needing material verification, the methods to acquire needed data, the communication methods used to exchange needed and gathered information between work groups and safeguards in place to ensure compliance with § 192.607(c).

3. *§ 192.607 Verification of Pipeline Material Properties and Attributes: Onshore steel transmission pipelines.*

(a). . . .

(f) *Components. For mainline pipeline components other than line pipe, an*

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operator must develop and implement procedures in accordance with paragraph (c) of this section for establishing and documenting the ANSI rating or pressure rating (in accordance with ASME/ANSI B16.5 (incorporated by reference, see § 192.7)),

(1) Operators are not required to test for the chemical and mechanical properties of components in compressor stations, meter stations, regulator stations, separators, river crossing headers, mainline valve assemblies, valve operator piping, or cross-connections with isolation valves from the mainline pipeline.

(2) Verification of material properties is required for non-line pipe components, including valves, flanges, fittings, fabricated assemblies, and other pressure retaining components and appurtenances that are:

(i) Larger than 2 inches in nominal outside diameter,

(ii) Material grades of 42,000 psi (Grade X-42) or greater, or

(iii) Appurtenances of any size that are directly installed on the pipeline and cannot be isolated from mainline pipeline pressures.

Enable's written procedures for establishing and documenting the ANSI rating or pressure rating were inadequate to assure safe operation of a pipeline facility in accordance with § 192.607(f). Specifically, Enable's procedure, I.43 Material Verification, (Rev. 1 - July 1, 2021), Section 7.3.3 Components, failed to provide adequate details regarding the material verification of non-line pipe components. Enable failed to adequately describe how it will verify non-line components that cannot be isolated from mainline pipeline pressures and methods it will use to gather information needed in accordance with § 192.607(f).

Therefore, Enable's written procedures for establishing and documenting the ANSI rating or pressure rating were inadequate to assure safe operation of a pipeline facility in accordance with § 192.607(f). Enable must revise its procedures as specified above.

4. ***§ 192.605 Procedural manual for operations, maintenance, and emergencies.***

(a). . . .

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.

§ 192.609 Change in class location: Required study.

Whenever an increase in population density indicates a change in class location for a segment of an existing steel pipeline operating at hoop stress that is more than 40 percent of SMYS, or indicates that the hoop stress corresponding to the established maximum allowable operating pressure for a segment of existing pipeline is not commensurate with the present class location, the operator shall immediately make a study to determine:

(a) The present class location for the segment involved.

(b) The design, construction, and testing procedures followed in the original construction, and a comparison of these procedures with those required for the present class location by the applicable provisions of this part.

(c) The physical condition of the segment to the extent it can be ascertained from available records;

(d) The operating and maintenance history of the segment;

(e) The maximum actual operating pressure and the corresponding operating hoop stress, taking pressure gradient into account, for the segment of pipeline involved; and

(f) The actual area affected by the population density increase, and physical barriers or other factors which may limit further expansion of the more densely populated area.

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Enable's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(1). Specifically, Enable's procedure, B.12-Evaluating Class Location Changes, (June 28, 2022), Section 7.1 GIS Review, failed to include adequate detail regarding incorporating updated or new GIS data into existing class locations. The procedure failed to adequately detail how Enable incorporates newly acquired pipeline assets and assets with updated pipeline and structure attributes into the GIS system to determine if a class location study is required under § 192.609.

Therefore, Enable's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(1). Enable must revise its procedures as specified above.

5. *§ 192.605 Procedural manual for operations, maintenance, and emergencies.*

(a). . . .

(b) *Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.*

(1) *Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.*

§ 192.619 Maximum allowable operating pressure: Steel or plastic pipelines.

(a) *No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure (MAOP) determined under paragraph (c), (d), or (e) of this section, or the lowest of the following:*

(1) *The design pressure of the weakest element in the segment, determined in accordance with subparts C and D of this part. However, for steel pipe in pipelines being converted under § 192.14 or uprated under subpart K of this part, if any variable necessary to determine the design pressure under the design formula (§ 192.105) is unknown, one of the following pressures is to be used as design pressure:*

(i) *Eighty percent of the first test pressure that produces yield undersection N5 of Appendix N of ASME B31.8 (incorporated by reference, see § 192.7), reduced by the appropriate factor in paragraph (a)(2)(ii) of this section; or*

(ii) *If the pipe is 12¾ inches (324 mm) or less in outside diameter* *and is not tested to yield under this paragraph, 200 p.s.i. (1379 kPa).*

(2) *The pressure obtained by dividing the pressure to which the pipeline segment was tested after construction as follows:*

(i) *For plastic pipe in all locations, the test pressure is divided by a factor of 1.5.*

(ii) *For steel pipe operated at 100 psi (689 kPa) gage or more, the test pressure is divided by a factor determined in accordance with the Table 1 to paragraph (a)(2)(ii):*

Table 1 to Paragraph (a)(2)(ii)

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	Installed before (Nov. 12, 1970)	Factors,[1 2] segment -		
		Installed after (Nov. 11, 1970) and before July 1, 2020	Installed on or after July 1, 2020	Converted under § 192.14
1	*1.1*	*1.1*	*1.25*	*1.25*
2	*1.25*	*1.25*	*1.25*	*1.25*
3	*1.4*	*1.5*	*1.5*	*1.5*
4	*1.4*	*1.5*	*1.5*	*1.5*

***1** For offshore pipeline segments installed, uprated or converted after July 31, 1977, that are not located on an offshore platform, the factor is 1.25. For pipeline segments installed, uprated or converted after July 31, 1977, that are located on an offshore platform or on a platform in inland navigable waters, including a pipe riser, the factor is 1.5.*

***2** For a component with a design pressure established in accordance with § 192.153(a) or (b) installed after July 14, 2004, the factor is 1.3.*

Enable's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(1). Specifically, Enable's procedure, B.10-Determination of MAOP, revision date February 1, 2020, Appendix B: List of Hydro Test Factors for Class Location and Appendix C: Process Flow for Determination of MAOP, failed to include all required information and contained errors.[1] Appendix B failed to include column three of Table 1 from § 192.619(a)(2)(ii) and Appendix C referenced an affidavit referred to as a "Gold Sheet."

Therefore, Enable's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(1). Enable must revise its procedures as specified above.

6. ***§ 192.624 Maximum allowable operating pressure reconfirmation: Onshore steel transmission pipelines.***

(a). . . .

(b) ***Procedures and completion dates. Operators of a pipeline subject to this section must develop and document procedures for completing all actions required by this section by July 1, 2021. These procedures must include a process for reconfirming MAOP for any pipelines that meet a condition of § 192.624(a), and for performing a spike test or material verification in accordance with §§ 192.506 and 192.607, if applicable. All actions required by this section must be completed according to the following schedule:***

(1) ***Operators must complete all actions required by this section on at least 50% of the pipeline mileage by July 3, 2028.***

[1] Although Enable implemented this procedure prior to the effective date of the revisions to Table 1 § 192.619(a)(2)(ii), Enable indicated during the inspection that this version of the procedure is the most current and has been used since the changes have been in effect.

(2) ***Operators must complete all actions required by this section on 100% of the pipeline mileage by July 2, 2035 or as soon as practicable, but not to exceed 4 years after the pipeline segment first meets a condition of § 192.624(a) (e.g., due to a location becoming a high consequence area), whichever is later.***

(3) ***If operational and environmental constraints limit an operator from meeting the deadlines in § 192.624, the operator may petition for an extension of the completion deadlines by up to 1 year, upon submittal of a notification in accordance with § 192.18. The notification must include an up-to-date plan for completing all actions in accordance with this section, the reason for the requested extension, current status, proposed completion date, outstanding remediation activities, and any needed temporary measures needed to mitigate the impact on safety.***

Enable's written procedures for reconfirming MAOP were inadequate to assure safe operation of a pipeline facility in accordance with § 192.624(b). Specifically, Enable's procedure, MAOP Reconfirmation Plan, revision 1 (August 26, 2022), Section 2 MAOP Reconfirmation Committee, failed to include adequate detail regarding Reconfirmation Committee activities. Enable failed to adequately describe how the committee decides on an appropriate reconfirmation method, timing of segments, appropriate intermediate reconfirmation goals, adjustments for acquisitions and divestitures, and record keeping for associated decision making in accordance with § 192.624(b).

Therefore, Enable's written procedures for reconfirming MAOP were inadequate to assure safe operation of a pipeline facility in accordance with § 192.624(b). Enable must revise its procedures as specified above.

7. ***§ 192.605 Procedural manual for operations, maintenance, and emergencies.***

(a). ...

(b) ***Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.***

(1) ***Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.***

§ 192.710 Transmission lines: Assessments outside of high consequence areas.

(a) . . . .

(b) General -

(1) . . . .

(3) Prior assessment. An operator may use a prior assessment conducted before July 1, 2020 as an initial assessment for the pipeline segment, if the assessment met the subpart O requirements of part 192 for in-line inspection at the time of the assessment. If an operator uses this prior assessment as its initial assessment, the operator must reassess the pipeline segment according to the reassessment interval specified in paragraph (b)(2) of this section calculated from the date of the prior assessment.

Enable's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(1). Specifically, Enable's procedure, 192.710 ETC Gas Plan, revision 03 (April 15, 2022), Section 6.2 Periodic Reassessments, failed to include adequate detail regarding the use and documentation of prior assessments. The procedure failed to identify who will make the *determination to use a prior assessment, the associated timelines, how this determination will be made, and what records will be generated to document this process in accordance with § 192.710(b)(3).*

Therefore, Enable's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(1). Enable must revise its procedures as specified above.

8. ***§ 192.605 Procedural manual for operations, maintenance, and emergencies.***

(a). . . .

(b) ***Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.***

(1) ***Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.***

§ 192.712 Analysis of predicted failure pressure.

(a) . . . .

(e) ***Data. In performing the analyses of predicted or assumed anomalies or defects in accordance with this section, an operator must use data as follows.***

(1) ***An operator must explicitly analyze and account for uncertainties in reported assessment results (including tool tolerance, detection threshold, probability of detection, probability of identification, sizing accuracy, conservative anomaly interaction criteria, location accuracy, anomaly findings, and unity chart plots or equivalent for determining uncertainties and verifying tool performance) in identifying and characterizing the type and dimensions of anomalies or defects used in the analyses, unless the defect dimensions have been verified using in situ direct measurements.***

(2) ***The analyses performed in accordance with this section must utilize pipe and material properties that are documented in traceable, verifiable, and complete records. If documented data required for any analysis is not available, an operator must obtain the undocumented data through § 192.607. Until documented material properties are available, the operator shall use conservative assumptions as follows:***

(i) ***Material toughness. An operator must use one of the following for material toughness:***

(A) ***Charpy v-notch toughness values from comparable pipe with known properties of the same vintage and from the same steel and pipe manufacturer;***

(B) ***A conservative Charpy v-notch toughness value to determine the toughness based upon the ongoing material properties verification process specified in § 192.607;***

(C) ***If the pipeline segment does not have a history of reportable incidents caused by cracking or crack-like defects, maximum Charpy v-notch toughness values of 13.0 ft.-lbs. for body cracks and 4.0 ft.-lbs. for cold weld, lack of fusion, and selective seam weld corrosion defects;***

(D) ***If the pipeline segment has a history of reportable incidents caused by cracking or crack-like defects, maximum Charpy v-notch toughness values of 5.0 ft.-lbs. for body cracks and 1.0 ft.-lbs. for cold weld, lack of fusion, and selective seam weld corrosion; or***

(E) ***Other appropriate values that an operator demonstrates can provide conservative Charpy v-notch toughness values of crack-related conditions of the pipeline segment. Operators using an assumed Charpy v-notch toughness value must***

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notify PHMSA in advance in accordance with § 192.18 and include in the notification the bases for demonstrating that the Charpy v-notch toughness values proposed are appropriate and conservative for use in analysis of crack-related conditions.

(ii) ***Material strength. An operator must assume one of the following for material strength:***

(A) ***Grade A pipe (30,000 psi), or***

(B) ***The specified minimum yield strength that is the basis for the current maximum allowable operating pressure.***

(iii) ***Pipe dimensions and other data. Until pipe wall thickness, diameter, or other data are determined and documented in accordance with § 192.607, the operator must use values upon which the current MAOP is based.***

Enable's written procedures for conducting operations and maintenance activities were inadequate to ensure safe operation of a pipeline facility in accordance with § 192.605(b)(1). Specifically, Enable's procedure, D.47 Evaluation of Remaining Strength Pipeline, revision September 1, 2022, Section 3.0 Applicability, failed to include adequate detail to conduct an accurate analysis of predicted failure pressure. The procedure failed to address measurement uncertainties such as tool tolerance, detection threshold, tool verification, and other potentially relevant data features in accordance with § 192.712(e).

Therefore, Enable's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 192.605(b)(1). Enable must revise its procedures as specified above.

9. ***§ 192.605 Procedural manual for operations, maintenance, and emergencies.***

(a). . . .

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) . . . .

(4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner.

Enable's written procedures for the gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner were inadequate to ensure safe operation of a pipeline facility in accordance with § 192.605(b)(4). Specifically, Enable's procedure A.15 PHMSA-States-Incident Reporting failed to detail identifying all Moderate Consequence Areas (MCAs). MCAs must be identified and included in the annual and incident reporting. Additionally, MCAs must be identified to comply with §§ 192.624 and 192.710.

Response and Corrective Actions:

NOA Item 1.) Although there is not an industry recognized or accepted calculation for the determination of a safe distance when hydrotesting, Energy Transfer's (ET) requirements have been revised to incorporate the guidance provided in INGAA's Construction Safety and Quality Consensus Guidelines: Pressure Testing (Hydrostatic & Pneumatic) Safety Guidelines. We have now included verbiage for the consideration of increasing the distance to more than 50 feet for test sections seeing extreme pressures and/or volumes. Safe distances would be determined during the development of the Test Plan where safety precautions are considered. Additionally, ET would like to note that to the fullest extent, the safe distance for non-testing personnel is maintained at a minimum of 200 feet. Attached is the draft of ES C4.0105 Pressure Testing Execution.

See Exhibit 1: SOP C4.0105 Pressure Testing Execution standard DRAFT 1.4.24

NOA Item 2.) EGT refutes this finding. The roles of the various work groups in the coordination of work to comply with §192.607 are detailed in SOP I.43 Material Verification, Section 5.0 Governance, as seen below:

- *Identification of populations (per §192.607(e)(1)) and their TVC records status is the responsibility of GIS (detailed in Section 5 and 7.1 of I.43).*
- *Tracking the remaining samples required in a given population per §192.607(e)(2) - (e)(5) is the responsibility of GIS and Asset Integrity (per Section 5 and 7.2 of I.43).*
- *Determination of whether a dig is opportunistic and a sample from the target pipe is required per §192.607(e)(2), (3), (4), (5), is done through coordination between pipeline integrity and Operations (per Section 7.2 of I.43)*
- *Performance of opportunistic sampling of populations requiring it per §192.607(c), (d) and (e) is the responsibility of Operations (detailed in Section 5 and 7.3 of I.43).*
- *Materials testing results review is the responsibility of the Integrity Metallurgist/NDE Specialist (detailed in Section 5 and 7.4 of I.43).*
- *Database and records updates are the responsibility of GIS/Engineering Records (detailed in Section 5 and 7.5 of I.43).*

See Exhibit 2: SOP I.43 Material Verification

NOA Item 3.) EGT refutes this finding. Verification of non-line pipe components that cannot be isolated from mainline pipeline pressure is evaluated in the same manner as those that can, as is detailed below from SOP I.43 Material Verification, Section 7.3.3:

> *Whenever possible, if manufacturing specifications are not known, the usage of manufacturer's stampings, markings, or tagged material pressure ratings and material type may be used to verify the pressure rating. All markings, stamps, tags, shall be documented on I.43A (Components TVC Material Verification Form) and shall also be photographically documented in detail of the overall view of the component and each marking.*
>
> *Whenever no markings are available, the material type shall be verified by Positive Material Identification (PMI) and the rating shall be verified through dimensional examinations compared to known specifications such as ASME B16.5, MSS-SP 44, ASME B16.34. Whenever this method is utilized, all findings shall be reviewed and verified by a subject matter expert.*

See Exhibit 2: SOP I.43 Material Verification

NOA Item 4.) SOP B.12 - Evaluating Class Location Changes was revised April 14, 2023. Included below is the GIS process for management of Class location changes.

GIS Management of Change Process Overview:
It is the responsibility of the Enable Gas Transmission's (EGT) GIS Management of Change (MOC) team to review proposed increases and decreases in Class Location rating. The MOC team uses a Class location calculator to determine if a Class location change has occurred. Those changes are then displayed in a MOC tracker application. This application displays pipeline attributes, MAOP, pipeline orientation and structures information to indicate that a class location change has occurred. The system displays the set boundaries for the proposed Class area. This MOC tracker application contains a Class review Task page with corresponding details page outlining the location of each proposed Class change, Responsible Operations area, and Pipeline system name. A corresponding Details Page allows the MOC analysts to view information about the Class change location, including but not limited to,

- Proximity Areas
- Facility Description
- O&M History
- MAOP
- Materials
- HCA ratings coincidental the proposed class area
- Pressure Test/s
- Components
- Anomaly data collected from Integrity inspection activities

This Detail Page also provides calculations for Allowable Operating Pressure as outlined in CFR 192.611. Allowable Operating Pressure is evaluated by one of the following methods:

- Determining if the highest MAOP value in the area of the class change is less than or equal to the lowest Not Tested (Same as New Construction), the pipe segment is considered commensurate for pressure for the proposed class rating.

- The highest MAOP value in the area of the class change is less than or equal to the lowest Tested in Place for 8 hours result (and is also less than or equal to the lowest Tested in Place for 8 Hours (Requalification) result, the pipe segment is considered commensurate for pressure for the proposed class rating.

The allowable pressure calculation results are stored in the class change and is calculated nightly for pending changes in the MOC workflow.

New, modified or removed structures are captured in EGT's electronic form entitled "B.13.C - Surveillance for Class Location-HCA Determination". The process for completing this form is detailed in the SOP B.13 Surveillance for Class Location and HCA Determination. The GIS application process includes a notification to the GIS team of newly created B.13.C forms, which allows the GIS team to digitally capture the data provided into EGT's integrated GIS database system. The structure data is then analyzed by a Class Location, HCA, and MCA calculator to determine changes in Class Location, HCA and MCA managed segments.

New pipeline assets, whether due to new construction or acquisition of a new Pipeline system, are digitized into the Energy Transfer integrated database mapping system. Once notified of the completion of the migration, the GIS MOC team runs the Class Location, HCA and MCA calculator, the results of which are then saved in the Energy Transfer official Class Location, HCA and MCA record located in Energy Transfer's Integrated Enterprise GIS database system.

See Exhibit 3: SOP B.12 Evaluating Class Location Changes

NOA Item 5.) SOP B.10 MAOP Determination was revised December 1, 2023. These revisions address Appendix B: List of Hydro Test Factors for Class Location, which was updated to include the appropriate test factors in column three of Table 1 from § 192.619(a)(2)(ii) and Appendix C: Process Flow for Determination of MAOP, which was updated to include MAOP determination process information and removed the reference to the Gold Sheet affidavit.

See Exhibit 4: SOP B.10 Determination of MAOP

NOA Item 6.) No changes were made to MAOP Reconfirmation Plan, as this plan meets the requirements of 49 CFR Part § 192.624. Section 192.624 does not specifically cite requirements that the MAOP Reconfirmation Plan "*include adequate detail regarding Reconfirmation Committee activities, such as how the committee decides on an appropriate reconfirmation method, timing of segments, appropriate reconfirmation goals, adjustments for acquisitions and divestitures, and record keeping for associated decision making in accordance with § 192.624(b)*":

> ***Procedures and completion dates.*** Operators of a pipeline subject to this section must develop and document procedures for completing all actions required by this section by July 1, 2021. These procedures must include a process for reconfirming MAOP for any pipelines that meet a condition of § 192.624(a), and for performing a spike test or material verification in accordance with §§ 192.506 and 192.607, if applicable. All actions required by this section must be completed according to the following schedule:
>
> (1) Operators must complete all actions required by this section on at least 50% of the pipeline mileage by July 3, 2028.
>
> (2) Operators must complete all actions required by this section on 100% of the pipeline mileage by July 2, 2035 or as soon as practicable, but not to exceed 4 years after the pipeline segment first meets a condition of § 192.624(a) (*e.g.,* due to a location becoming a high consequence area), whichever is later.
>
> (3) If operational and environmental constraints limit an operator from meeting the deadlines in § 192.624, the operator may petition for an extension of the completion deadlines by up to 1 year, upon submittal of a notification in accordance with § 192.18. The notification must include an up-to-date plan for completing all actions in accordance with this section, the reason for the requested extension, current status, proposed completion date, outstanding remediation activities, and any needed temporary measures needed to mitigate the impact on safety.

The MAOP Reconfirmation Plan meets these requirements in § 192.624(b). In 2023 the MAOP Reconfirmation Committee approved the following changes to the MAOP Reconfirmation plan:

- Section 1.0, included Companies from recent acquisitions;
- Sections 3.0 and 5.0, included process flowcharts for *Identification of Pipeline Segments that Require MAOP Reconfirmation* and *Reconfirmation Methods*, respectively.

See Exhibit 5: MAOP Reconfirmation Plan

NOA Item 7.) Energy Transfer has prepared redlines to the 192.710 ETC Gas Plan to include who will make the determination to use a prior assessment as the initial assessment and how the determination will be documented per 192.710 (b)(3). Below is an excerpt of the revisions to Section 6.1 of the 192.710 ETC Gas Plan:

> *In many cases, the pipeline segments requiring assessment through this plan may have already been assessed in fulfillment of other code requirements, such as 49 CFR 192 Subpart O or 49 CFR 192.624. Many of those assessments may fulfill the requirements of this plan, in instances where the threats identified for the segment for the other requirements overlap the threats for the requirements of this plan; and where the assessment methodology was an In-line Inspection (ILI). The Integrity Engineer, in consultation with the Manager of Pipeline Integrity, may determine to use a past assessment not required by this plan as the initial assessment for a segment identified by this plan, so long as all the relevant threats have been assessed, the entirety of the segment required by this plan was assessed, and the assessment met the 192 subpart O requirements for in-line inspection at the time of the assessment. The decision to use a past assessment to fulfill the initial assessment requirement of this plan will be documented by recording the date of the past assessment in the IAP and as a summary of the assessment results in the Pipeline Assessment Report (PAR) for that pipeline segment.*

See Exhibit 6: 192.710 ETC Gas Plan Draft Rev05 1-9-2024

NOA Item 8.) EGT refutes this finding. No changes were made to SOP *D.47 Evaluation of Remaining Strength Pipeline Metal Loss* as this procedure is used for in situ or in-the-ditch measurements of metal loss to determine remaining strength of the pipe. §192.712(e)(1) states that the operator must account for uncertainties in reported assessment results in identifying and characterizing the defects used in predicted failure pressure analyses unless the defect dimensions have been verified using in situ direct measurements. Since SOP D.47 uses in-the-ditch measurements to determine remaining strength, uncertainties or tolerances are not required.

192.712(e) -

> *(1) An operator must explicitly analyze and account for uncertainties in reported assessment results (including tool tolerance, detection threshold, probability of detection, probability of identification, sizing accuracy, conservative anomaly interaction criteria, location accuracy, anomaly findings, and unity chart plots or equivalent for determining uncertainties and verifying tool performance) in identifying and characterizing the type and dimensions of anomalies or defects used in the analyses,* ***unless the defect dimensions have been verified using in situ direct measurements.***

See Exhibit 7: SOP D.47 Evaluation of Remaining Strength Pipeline Metal Loss

NOA Item 9.) EGT refutes this finding. No changes were made to SOP A.15 PHMSA-States-Incident Reporting, as this procedure is intended to meet the requirements of 49 CFR Part 191, 1913, 191.5, and 191.15 specifically. The requirements of "§192.624 Maximum allowable operating pressure reconfirmation: Onshore steel transmission pipelines." and "§192.710 Transmission lines: Assessments outside of high consequence areas." is addressed in the Company's "MAOP Reconfirmation Plan", and the "192.710 Plan". GIS data reports are utilized for Incident Reports and Annual reporting.

SOP's A.15 PHMSA-States-Incident Reporting and A.16 Annual Report - PHMSA adhere to and refer to PHMSA's reporting instructions; Instructions for Form PHMSA F 7100.2-1 Annual Report and Instructions for Form PHMSA F 7100.2 Incident Report. As with HCAs, MCAs are locked into PHMSA Portal report requirements for both the Incident Reports and the Annual Reports. An Operator must address these entry requirements, or they cannot close either type of report.

In addition, SOP A.01 Glossary and Acronyms is referenced within SOP A.15, where MCA is defined.

See Exhibit 8: SOP A.01 Glossary and Acronyms
See Exhibit 9: SOP A.15 PHMSA/States-Incident Reporting
See Exhibit 10: SOP A.16 Annual Report - PHMSA
See Exhibit 11 MAOP Reconfirmation Plan (Same as Exhibit 9 above.)
See Exhibit 12: 192.710 ETC Gas Plan Draft Rev05 1-9-2024 (Same as Exhibit 10 above.)

With the actions taken and supporting documentation provided herein, EGT/EMRT believes it has fulfilled the requirements of this NOPV. Should you have any questions in this regard, please contact Jimmy Cross at 405-576-8230 or at Jimmy.Cross@EnergyTransfer.com.

Respectfully,

Eric Amundsen
Senior VP, Operations

Exhibits:
1. SOP C4.0105 Pressure Testing Execution Standard DRAFT 1.4.24
2. SOP I.43 Material Verification
3. SOP B.12 Evaluating Class Location Changes
4. SOP B.10 Determination of MAOP
5. and 11. SOP MAOP Reconfirmation Plan

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6. and 12. 192.710 ETC Gas Plan Draft Rev05 1-9-2024
7. SOP D.47 Evaluation of Remaining Strength Pipeline Metal Loss
8. SOP A.01 Glossary and Acronyms
9. SOP A.15 PHMSA/States-Incident Reporting
10. SOP A.16 Annual Report – PHMSA

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