

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: tom.long@energytransfer.com

May 2, 2024

Thomas Long
Chief Executive Officer
Energy Transfer, LP
8111 Westchester Drive,
Dallas, Texas 75225

CPF 4-2024-031-NOA

Dear Mr. Long:

From March 6 to October 17, 2023, a representative 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 on-site inspection of Enable Gas Transmission, LLC's (Enable)¹ integrity management plan in Oklahoma City, Oklahoma.

As a result of the inspection, PHMSA has identified the apparent inadequacy found within Enable's plans or procedures. The item inspected and the inadequacy are described below:

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)

(2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.

§ 192.493 In-line inspection of pipelines.

When conducting in-line inspections of pipelines required by this part, an operator must comply with API STD 1163, ANSI/ASNT ILI-PQ, and NACE SP0102, (incorporated by reference, *see* § 192.7).

¹ Enable Gas Transmission, LLC is a subsidiary of Energy Transfer, LP.

Assessments may be conducted using tethered or remotely controlled tools, not explicitly discussed in NACE SP0102, provided they comply with those sections of NACE SP0102 that are applicable.

Enable's written procedures for conducting operations and maintenance activities were inadequate to assure the safe operation of a pipeline facility in accordance with § 192.605(b)(2). Specifically, Enable's *Pipeline Integrity Management Plan* (Revision No. 17; Dated 05/24/2023) section 7.2.3 and *In-Line Inspection Specification – PI-1.3* (Revision Date: 05/25/2022) section 6.1 failed to include in-line inspection (ILI) survey acceptance criteria as required by section 5.1.5 in NACE SP0102 in accordance with § 192.493.

Section 5.1.5 in NACE SP0102 requires that operators and ILI vendors develop and agree to a set of ILI survey-acceptance criteria, such as physical damage to sensors after an ILI run, lost sensor channels on data, sensor noise, distance inaccuracy, missed or not recorded features, and velocity overruns, prior to the start of an ILI run.

Enable's procedures failed to include the requirement to develop and agree to a set of survey-acceptance criteria that define when a rerun survey is required in accordance with section 5.1.5 of NACE SP0102.

Therefore, Enable's written procedures for controlling corrosion were inadequate to assure the safe operation of a pipeline facility in accordance with § 192.605(b)(2). Enable must revise its procedures to require the development of ILI survey-acceptance criteria as required by NACE SP0102.

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 Enforcement 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 Gas Transmission, LLC maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Bryan Lethcoe, Director, Southwest, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2024-031-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Bryan Lethcoe
Director, Southwest Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings

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