



Via Electronic Mail

July 31, 2025

Mr. Bryan Jeffery Lethcoe
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner Road, Suite 630
Houston, TX 77074

**RE: East Tennessee Natural Gas, LLC
Notice of Probable Violation and Proposed Compliance Order
CPF 4-2025-039-NOPV**

Dear Mr. Lethcoe,

From June 4 through 6, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected East Tennessee Natural Gas, LLC's¹ (ETNG) liquefied natural gas (LNG) facility in Kingsport, TN.

On July 3, 2025, PHMSA issued the above referenced Notice of Probable Violation (NOPV) and Proposed Compliance Order (PCO) alleging ETNG committed probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR).

The following is a summary of PHMSA's concern and ETNG's response to the concern.

PHMSA Finding

1. § 193.2441 Control Center.

(c) Each control center must have personnel in continuous attendance while any of the components under its control are in operation, unless the control is being performed from another control center which has personnel in continuous attendance.

¹ East Tennessee Natural Gas, LLC, is a subsidiary of Enbridge, Inc.

ETNG failed to have personnel in continuous attendance in its control center or alternate control center while any of the components under its control were in operation in accordance with § 193.2441(c). Specifically, ETNG failed to maintain personnel in continuous attendance at its Kingsport LNG facility control center.

ETNG Response

ETNG recognizes that under current regulation, specifically § 193.2441, each LNG control center must have personnel in continuous attendance while any of the components under its control are in operation. ETNG requests that PHMSA take into consideration the following in its response to the above issued NOPV and PCO.

ETNG has since implemented a mobile solution at the Kingsport LNG facility which provides for the on-duty control center operator, via a mobile human machine interface (HMI) device², the necessary monitoring and control functionality of the onsite control center's SCADA while absent from the control center. Only operational activities that would be performed during routine inspections within the facility are conducted while utilizing the device. Any identified need for maintenance activities either requires a call out or is scheduled at a later time during normal (fully staffed) hours of operation.

Both physical and administrative controls are configured on the device to ensure control is limited to specific boundaries within the facility (through geofencing) and only conducted by qualified individuals (through login credentials). This solution allows for continuous monitoring and control (through 24/7 manned operation at the facility) as well as immediate response capabilities (with assistance from strategic alarming), for any operational issue or emergency that may arise while the operator is briefly absent from the control center.

Additionally, ETNG requests consideration of the Advanced Notice of Proposed Rulemaking (ANPRM) issued by PHMSA on May 5th, 2025, to update CFR 193 regulations for LNG by aligning them with NFPA 59A-2023. Specifically, section 18.6.1.1 of NFPA 59A-2023 states, *"At plants with onsite control centers, operating personnel shall be permitted to leave the control room to perform scheduled field inspections or to address activities in the field related to the plants operation,"* which aligns with ETNG's practice at the time of the inspection and current practice enhanced with the utilization of the mobile HMI device.

² Tablet-based mobile HMI device with private cellular 5G connectivity, customized screens for at-a-glance process data display and integration into the ICS (Industrial Control Systems) domain for secure network authentication and access control

Finally, ETNG requests clarification on the issuance of this finding as a NOPV and PCO, where previous enforcements on findings similar to those within this NOPV and specific to §193.2441 have been issued as a Warning Letter or a Notice of Amendment. ETNG also requests that PHMSA consider amending the above issued NOPV and PCO to a Warning Letter due to previously issued enforcements for similar findings, as well as ETNG's implementation of the mobile HMI device into the current operation and procedures for the Kingsport LNG facility.

ETNG is committed to the continual improvement of its safety processes and procedures. We appreciate PHMSA's consideration of the foregoing response to the NOPV and PCO. Please call me at (713) 627-6601 if you need additional information or have any questions.

Sincerely,

A handwritten signature in black ink that reads "Peter Seydewitz". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Peter Seydewitz
Director, Operational Excellence
GTM Engineering & Asset Management