



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

8701 S. Gessner, Suite 630
Houston TX 77074

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: walter.pinto@enlink.com

August 20, 2025

Walter Pinto
Executive Vice President
EnLink Processing Services, LLC
1722 Routh Street Suite 1300
Dallas, Texas 75201

CPF 4-2025-046-NOA

Dear Mr. Pinto:

From April 16 to October 10, 2024 of the on-site inspection, representatives 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.) inspected EnLink Processing Services, LLC's (EnLink) procedures for operations and maintenance in Dallas, Texas.

As a result of the inspection, PHMSA has identified the apparent inadequacies found within EnLink's procedures. The items inspected and the inadequacies 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) 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)

(c) *Assessment method.* The initial assessments and the reassessments required by paragraph (b) of this section must be capable of identifying anomalies and defects associated with each of the threats to which the pipeline segment is susceptible and must be performed using one or more of the following methods:

(1)

(3) *Spike hydrostatic pressure test.* A spike hydrostatic pressure test conducted in accordance with § 192.506. A spike hydrostatic pressure test is appropriate for time-dependent threats such as stress corrosion cracking; selective seam weld corrosion; manufacturing and related defects, including defective pipe and pipe seams; and other forms of defect or damage involving cracks or crack-like defects;

EnLink's written procedures for conducting operations and maintenance activities were inadequate to provide safety during maintenance and operations in accordance with § 192.605(b)(1). Specifically, EnLink's written manual failed to include procedures for conducting a spike hydrostatic pressure test in accordance with § 192.710(c)(3).

EnLink's procedure, *Gas Integrity Management Plan* (rev. 6.0; May 23, 2023) (IMP), table IMP 9-3 – Assessment Requirements for Transmission Pipelines in HCA's, Note 4, provides for a spike hydrostatic pressure test for time-dependent threats, selective seam weld corrosion, manufacturing and related defects, and other forms of defect or damage involving cracks or crack-like defects. In addition, EnLink's procedure, *Pressure Testing Standards* (Rev. 7.0; May 22, 2018), tables 1 Onshore Gas Pipelines – Test Requirements, Note 1, provides for the performance of a spike hydrostatic test if warranted, and requires a 15-minute test at 100 percent of specified minimum yield strength (SMYS) or 1.5 MAOP per § 192.506. However, EnLink's procedures do not included detailed procedural steps for performing a spike hydrostatic test in accordance with the requirements in § 192.506. .

Therefore, PHMSA proposes that EnLink revise its procedures to include specific instructions for performing a spike hydrostatic pressure test in accordance with the requirements in § 192.506.

2. § 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) *Initial assessment.* An operator must perform initial assessments in accordance with this section based on a risk-based prioritization schedule and complete initial assessment for all applicable pipeline segments no later than July 3, 2034, or as soon as practicable but not to exceed 10 years after the pipeline segment first meets the conditions of § 192.710(a) (e.g., due to a change in class location or the area becomes a moderate consequence area), whichever is later.

EnLink's written procedures for conducting operations and maintenance activities were inadequate to provide safety during maintenance and operations in accordance with § 192.605(b)(1). Specifically, EnLink's procedure, *Non-HCA Assessments ENL-GOM-0098* (version 3.0; rev. May 23, 2023), failed to include a risk-based prioritization schedule, including any detailed instructions or criteria for developing a risk-based prioritization schedule, for performing initial assessments on segments outside of HCAs in accordance with § 192.710(b)(1).¹

Therefore, PHMSA proposes that EnLink revise its procedures to include detailed instructions for developing a risk-based prioritization schedule for performing initial assessments on segments subject to § 192.710(a), in accordance with § 192.710(b).

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 Compliance 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 90 days of

¹ Section 192.710 applies to onshore steel transmission pipeline segments with an MAOP greater than or equal to 30 percent SMYS, and located in a Class 3 or 4 location, or a moderate consequence area (MCA).

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 EnLink Processing Services, 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 Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2025-046-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

cc: Timothy Murphy, Director of AIMS, EnLink Processing Services, LLC,
timothy.murphy@enlink.com
Michael LeBlanc, SVP Operations, EnLink Processing Services, LLC,
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Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings