



September 19, 2025

Via Electronic Mail to: Bryan.Lethcoe@dot.gov

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

Re: CPF 4-2025-046-NOA

Dear Mr. Lethcoe,

EnLink Processing Services, LLC (EnLink), a subsidiary of ONEOK, Inc., received the above-mentioned Notice of Amendments dated August 20, 2025. EnLink appreciates the opportunity to respond. EnLink does not contest the items listed in the notice. Attached are the proposed procedural updates to satisfy each NOA item in CPF 4-2025-046-NOA.

Item 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)

2

(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 include 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.

ENLINK RESPONSE:

EnLink does not contest this item and has made appropriate amendments to its procedures. EnLink has amended the EnLink Pressure Testing Standards V8.0 to include newly added section 9.20 – Procedures for Conducting a Spike Hydrotest. Additionally, updates were made to section Table 1, note 1 and Table 2, note 1 in section 9.7 to reference 9.20. Attached are the updated pages with changes highlighted.

Item 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).

ENLINK RESPONSE

EnLink does not contest this item and has made appropriate amendments to its procedures. EnLink has amended the ENL-GOM-00098 Non-HCA Assessments Final – section 4.1.1 to include detailed instructions for developing a risk-based prioritization schedule. Attached are the updated pages with changes highlighted.

Sincerely,

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