

**NOTICE OF PROBABLE VIOLATION
AND
PROPOSED COMPLIANCE ORDER**

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 4-2025-047-NOPV

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) operations and maintenance records for its Sabine Natural Gas pipeline in Dallas, TX.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (C.F.R.). The item inspected and the probable violation is:

1. § 192.925 What are the requirements for using External Corrosion Direct Assessment (ECDA)?

(a)

(b) *General requirements.* An operator that uses direct assessment to assess the threat of external corrosion must follow the requirements in this section, in ASME/ANSI B31.8S (incorporated by reference, *see* §192.7), section 6.4, and in NACE SP0502 (incorporated by reference, *see* §192.7). An operator must develop and implement a direct assessment plan that has procedures addressing pre-assessment, indirect inspection, direct examination, and post assessment. If the ECDA detects pipeline coating damage, the operator must also

integrate the data from the ECDA with other information from the data integration (§192.917(b)) to evaluate the covered segment for the threat of third party damage and to address the threat as required by §192.917(e)(1).

(1)

(3) *Direct Examination.* In addition to the requirements in ASME /ANSI B31.8S section 6.4 and NACE SP0502, section 5, the plan's procedures for direct examination of indications from the indirect examination must include—

EnLink failed to implement its direct assessment plan for using External Corrosion Direct Assessments (ECDAs) to perform a direct examination in accordance with § 192.925(b)(3). Specifically, EnLink failed to perform a direct examination of its Dig 1 site on its Sabine pipeline in accordance with its procedure *Direct Assessment* (Rev. May 23, 2023).

EnLink's procedure *Direct Assessment* (Rev. May 23, 2023), Sec. 3.2 states that EnLink adheres to NACE SP502-2010, which states in Section 5.2.2.1.2 that immediate action is required when more than one indirect inspection tool at roughly the same location classify corrosion activity as severe. EnLink's third-party contractor report, *22in HGPP to East Bank Calcasieu ECDA Final Report* (Jan. 31, 2022), Appendix 17: Remaining Indications, evaluated the HCA6 Elliott Road site as having severe alternating current voltage gradient (ACVG) survey results and severe alternating current, current attenuation (ACCA) results. However, EnLink failed to perform a direct assessment of the site.

Therefore, EnLink failed to implement its direct assessment plan for using External Corrosion Direct Assessments (ECDAs) to perform a direct examination in accordance with § 192.925(b)(3).

Proposed Civil Penalty

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023, and before December 30, 2024, the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023, and before December 28, 2023, the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022, and before January 6, 2023, the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,412 for a related series of violations. For violation occurring on or after May 3, 2021, and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021, and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019, and before January 11, 2021, the maximum penalty may not exceed \$218,647 per

violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations.

We reviewed the circumstances and supporting documents involved in this case and have decided not to propose a civil penalty assessment at this time.

Proposed Compliance Order

With respect to Item 1, pursuant to 49 U.S.C. § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to Enlink. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

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. All material you submit in response to this enforcement action may be 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 your receipt of this Notice, you have 30 days to respond as described in the enclosed *Response Options*. 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 a Final Order. If you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from receipt of this Notice. The Region Director may extend the period for responding upon a written request timely submitted demonstrating good cause for an extension.

In your correspondence on this matter, please refer to **CPF 4-2025-047-NOPV** 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

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Enforcement Proceedings

cc: Timothy Murphy, Director of AIMS, EnLink Processing Services, LLC,
timothy.murphy@enlink.com
Michael LeBlanc, SVP Operations, EnLink Processing Services, LLC,
michael.leblanc@enlink.com

PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to EnLink Processing Services, LLC (EnLink) a Compliance Order incorporating the following remedial requirements to ensure the compliance of EnLink with the pipeline safety regulations:

- A. In regard to Item 1 of the Notice pertaining to EnLink's failure to implement its direct assessment plan for using External Corrosion Direct Assessments (ECDAs) in accordance with § 192.925(b)(3), EnLink must perform a direct examination of Dig 1, and provide records of the results of the examination and the post assessment and continuing evaluation based on the result, to the Director, Southwest Region, within 90 days of receipt of the Final Order.
- B. It is requested (not mandated) that EnLink maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Bryan Lethcoe, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.