



March 12, 2026

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

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

RE: CPF 4-2026-006-NOA

Dear Mr. Lethcoe,

EnLink Processing Services, LLC (EnLink), a subsidiary of ONEOK Inc, acknowledges receipt of the above-mentioned inspection package dated February 11, 2026. The Notice of Amendment (NOA) identified apparent inadequacies with EnLink's Pipeline Internal Communications Plan (05/25/2022) and Hazardous Liquid Integrity Management Plan, V-6.0 section 8.9 (12/08/2023). EnLink does not contest the identified inadequacies identified as Item 1 and Item 2 and appreciates the opportunity to collaborate and provide the amended procedures to address identified inadequacies.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles L. Misak".

Charles L. Misak
Director Asset Integrity & Engineering

cc: Jason Smith, VP Asset Integrity
Walter Allen, VP, Operations, Natural Gas Liquids Pipelines
DOTCompliance@oneok.com

Item 1

§ 195.446 Control room management.

(a)

(c) *Provide adequate information.* Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following:

(1)

(3) Test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months;

EnLink's written procedures were inadequate to provide for the safe operation of a pipeline facility in accordance with § 195.402(c)(15). Specifically, EnLink's *Pipeline Internal Communications Plan* (05/25/2022) (ICP) failed to include adequate procedures to test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months in accordance with § 195.446(c)(3). EnLink's ICP also fails to give adequate guidance on operating a pipeline facility during a SCADA outage. Therefore, PHMSA proposes that EnLink must revise its ICP to include procedures to test and verify an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months, and include adequate guidance on operating a pipeline facility during a SCADA outage.

EnLink Response

EnLink has amended its Internal Communications Plan to include testing and verification of an internal communication plan to provide adequate means for manual operation of the pipeline safely, at least once each calendar year, but at intervals not to exceed 15 months as well as include adequate guidance on operating a pipeline facility during a SCADA outage. Please see attachment I, which highlights the amendments made to the plan.

Item 2

§ 195.452 Pipeline integrity management in high consequence areas.

(a)

(b) What program and practices must operators use to manage pipeline integrity? Each operator of a pipeline covered by this section must:

(1) Develop a written integrity management program that addresses the risks on each segment of pipeline in the first column of the following table no later than the date in the second column:

(c)

(i) What preventive and mitigative measures must an operator take to protect the high consequence area?

(1)

(3) Leak detection. An operator must have a means to detect leaks on its pipeline system. An operator must evaluate the capability of its leak detection means and modify, as necessary, to protect the high consequence area. An operator's evaluation must, at least, consider the following factors—length and size of the pipeline, type of product carried, the pipeline's proximity to the high consequence area, the swiftness of leak detection, location of nearest response personnel, leak history, and risk assessment results.

EnLink's written procedures were inadequate to provide for the safe operation of a pipeline facility in accordance with § 195.452(i)(3). Specifically, EnLink's *Hazardous Liquid Integrity Management Plan, V-6.0*, section 8.9 (12/08/2023) (HL IMP) lacks sufficient detail to evaluate the capability of its leak detection means and to modify as necessary to protect the high consequence area. Section 8.9 merely references the regulation and states that Form 107 will provide more details without explaining how its process considers all of the required factors in § 195.452(i)(3), as well as other relevant factors. Therefore, PHMSA proposes that EnLink must revise its HL IMP to include how its leak detection evaluation process considers all of the required factors in § 195.452(i)(3).

EnLink Response

EnLink has amended its Integrity Management Plan to include how its leak detection evaluation process considers all the required factors in § 195.452(i)(3). Please see Attachment II, which highlights the amendments made to the plan.