



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

JUN 29 2018

1200 New Jersey Avenue, SE
Washington, D.C. 20590

Mr. J. A. Drake
Vice President, Operations and EHS
Spectra Energy Partners, LP
5400 Westheimer Court
Houston, TX 77056

Docket No. PHMSA-2016-0009

Dear Mr. Drake:

On January 12, 2016, NEXUS Gas Transmission, LLC (NEXUS) wrote to the Pipeline and Hazardous Materials Safety Administration (PHMSA) requesting a special permit to waive compliance with the pipeline safety regulations in 49 Code of Federal Regulations (CFR) 192.625 that require odorant in the natural gas transported through a portion of the NEXUS transmission pipeline located in Washtenaw County, Michigan.

The NEXUS special permit request is that PHMSA waive the odorant requirements of 49 CFR 192.625 for the odorization of up to 1.5 billion cubic feet per day of natural gas transported for approximately 9.84 miles of the NEXUS pipeline, from Mile Post (MP) 246.25 to MP 256.09 in Washtenaw County, Michigan. The request to waive the safety requirements in 49 CFR 192.625(b) is due to there being significant technical and operational problems to take receipt of large volumes of odorized gas in the downstream pipelines and storage fields, wherein odorization is not required by law. Also, NEXUS submitted documentation to PHMSA that the pipeline could not be re-routed to avoid class 3 locations, since the NEXUS pipeline termination was at MP 256.09, where it ties into the DTE Gas Company facilities to use existing DTE Gas Company and Vector pipeline facilities to further transport the gas volumes.

NEXUS requested the special permit to include additional design, materials, construction, operations and maintenance measures that will increase the level of safety in Washtenaw, County, Michigan to a greater extent than would be achieved by introducing odorant.

49 CFR 192.625(b) requires odorization of natural gas in transmission pipeline segments where more than 50 percent of the downstream pipeline segment mileage is in a class 3 or 4 location. The NEXUS pipeline from MP 246.25 to MP 256.09 in Washtenaw County Michigan, meets the Federal pipeline safety regulation requirements to odorize without a special permit waiver.

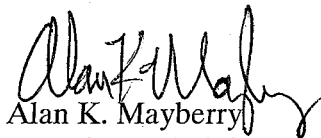
PHMSA is granting this special permit (enclosed) to NEXUS to not odorize the NEXUS pipeline from the Mile Posts described in the special permit with implementation of additional conditions for the design, materials, construction, operations, and maintenance of the 256.09-mile, 36-inch diameter natural gas transmission pipeline.

This special permit provides relief from the Federal pipeline safety regulations for the NEXUS special permit segments and requires NEXUS to comply with certain conditions and limitations designed to maintain pipeline safety where pipeline segments are not odorized.

PHMSA grants this special permit based on the findings set forth in the "Special Permit Analysis and Findings" document, which can be read in its entirety in Docket No. PHMSA-2016-0009 at www.Regulations.gov.

My staff would be pleased to discuss this matter or any other regulatory matter with you. John Gale, Director, Division of Standards and Rulemaking, may be contacted at 202-366-0434 on regulatory matters, and Kenneth Lee, Director, Division of Engineering and Research, may be contacted at 202-366-2694 on technical matters specific to this special permit application.

Sincerely,



Alan K. Mayberry
Associate Administrator for Pipeline Safety

Enclosure: Special Permit – PHMSA-2016-0009