



Enbridge
5400 Westheimer Court
Houston, Texas 77056

November 6, 2019

Mr. Alan Mayberry
Associate Administrator for Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave., S.E.
Washington, D.C. 20590-0001

NOV 18 2019

**RE: Docket No. PHMSA-RSPA-2003-15122
Texas Eastern Transmission, L.P.
Pennsylvania Class Location Special Permit
Special Permit Renewal**

Dear Mr. Mayberry,

On August 27, 2004, the Pipeline and Hazardous Materials Safety Administration (PHMSA) granted a special permit to Texas Eastern Transmission, LP (TETLP) waiving the pipe replacement/pressure reduction requirements of 49 CFR 192.611(a). PHMSA issued a renewal of the special permit on May 15, 2015. The special permit applies to certain pipeline segments that had changed from Class 1 to Class 2 on TETLP's system in Pennsylvania (Lines 12 and 19 on the discharges of Entriken, Perulack, Bernville, and Bechtelsville Compressor Stations). The special permit includes the technical criteria for pipeline segments to be included under the special permit and requires TETLP to conduct alternative risk control activities in lieu of pipe replacement or pressure reduction. The special permit is valid for a 5-year term¹, which expires on May 15, 2020. TETLP hereby requests the special permit be renewed. TETLP is required to include a summary report in accordance with Condition 15 and demonstrate that the special permit is still consistent with pipeline safety in accordance with Limitation 7 of the special permit. The following is a summary of required information and the documentation provided.

a. Special Permit

A copy of the original grant of the special permit is provided in Appendix A.

b. Docket

The PHMSA Docket Number of the issued permit is PHMSA-RSPA-2003-15122

¹ On May 15, 2015, PHMSA modified the special permit to limit it to a term of no more than five (5) years from the modification date of May 15, 2015 and allows TETLP to seek renewal at least 180 days prior to the expiration of the five (5) year period.

c. Summary Report

i. Special Permit Number

The Special Permit Number is PHSMA-RSPA-2003-15122

ii. Grantee, or Pipeline Owner or Operator

The Grantee is Texas Eastern Transmission, L.P.

The parent company is Enbridge²

1. Executive Contact

Tom Wooden

Vice President, Enbridge GTM Engineering and Asset Management

5400 Westheimer Court

Houston, TX 77056

2. Technical or Operational Contact

Nathan Atanu

Supervisor, Operational Compliance

Enbridge

5400 Westheimer Court

Houston, TX 77056

iii. Location of Special Permit

The special permit applies to 42 special permit segments and approximately 12.62 miles of pipeline, which consists of approximately 6.76 miles of 24-inch Line 12 and 5.86 miles of 30-inch Line 19. The special permit segments are located in Perry, Berks, Huntingdon, Juniata, Montgomery, and Buck Counties in Pennsylvania and Hunterdon County in New Jersey. The locations of the special permit segments are provided in Appendix B.

iv. Applicable Usage or Need of the Special Permit

The need of the Special Permit is to waive compliance from sections 49 CFR §§ 192.611 in the Federal Pipeline Safety Regulations to confirm or revise maximum allowable operating pressure (MAOP) following a change in class location for 42 special pipeline segments located on parallel Lines 12 and Line

² On February 27, 2017, Enbridge Inc. and Spectra Energy Corp closed their merger transaction. Enbridge Inc. now indirectly controls the general partner of Spectra Energy Partners, LP (SEP), a master limited partnership, which continues to indirectly own Texas Eastern Transmission, LP. Since 2017, there have been no mergers, acquisitions, transfer of assets, or other events affecting the regulatory responsibility of TETLP with respect to the pipeline in the special permit inspection area.

19. Renewal of this Special Permit will allow TETLP to continue to operate the Special Permit segments of 24-inch Line 12 and 30-inch Line 19 pipelines operate at the existing pressure of 1,050 psig, and above 72% SMYS up to 80.77% SMYS.

- v. Annual Report
Copies of the four (4) annual reports since the renewal of the Special Permit are provided in Appendix C.
- vi. In-service incidents for Special Permit Area
No in-service ruptures or leaks have occurred since issuance of the Special Permit.
- vii. Annual Reports Summary
A summary report demonstrating that the special permit is still consistent with pipeline safety is provided in Appendix D. The report includes a high-level summary of the safety performance of the special permit segments, a summary of activities under the conditions specified PHMSA's renewal requirements and a summary of the annual reports.

The pipelines covered by the original special permit have operated safely under the original special permit conditions, with no leaks or reportable incidents within the special permit segments since PHMSA issued this special permit. The information provided herein, along with the information in the annual reports, confirms our commitment to meet the additional integrity management efforts associated with this special permit. These efforts and the results of those efforts validate the integrity of these segments, show these segments continue to operate within the premises of the special permit, and show these segments are well suited for renewal of this special permit.

TETLP recognizes that some of the baseline work has already been completed under the existing Special Permit. TETLP requests that PHMSA provides TETLP the opportunity to make modifications to the Special Permit conditions to reflect this completed work.

Thank you for your consideration of this matter. Please contact Nathan Atanu at (713) 627-5008 if you need any additional information regarding this issue.

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Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas V. Wooden, Jr.", written in a cursive style.

Thomas V. Wooden, Jr.
Vice President, GTM Engineering and Asset Management

Enclosure

cc (w/enclosure):

Linda Daugherty (PHMSA)
Sentho White (PHMSA)
John Gale (PHMSA)
Robert Burrough (PHMSA)