

ATTACHMENT 50 – *ENBRIDGE RESPONSE TO PHMSA ADVISORY BULLETIN, JULY 21, 2010*



July 21, 2010

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United States Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
1200 New Jersey Avenue, S.E.
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Electronic submission to: PHMSA.OPA90@dot.gov;
melanie.barber@dot.gov

Re: Response to Advisory Bulletin ADB-10-05
Enbridge OPS Sequence Numbers #866 (Superior Region); #867 (Chicago Region);
#665 (North Dakota Region); #1666 (Cushing Region)

In response to the Pipeline and Hazardous Materials Safety Administration Advisory Bulletin (ADB-10-05), Enbridge has conducted an assessment of our emergency preparedness in relation to a worst case discharge for each of the Response Zones listed above. Results of our review are as follows:

Oil Spill Response Organizations (OSROs):

We have contacted our two designated Oil Spill Response Organizations (OSROs) – Bay West Inc. and Garner Environmental Services Inc. Both have confirmed the continuance of their OSRO certification and their ability to deploy appropriate spill response resources to an Enbridge worst case discharge in the Response Zones that they are associated with. Enbridge has reviewed and accepted these declarations.

Oil Spill Training Exercises:

Enbridge conducts oil spill training exercises on a continuing basis as listed in our Facility Response Plan and in accordance with the National Preparedness for Response Exercise Program (PREP) Guidelines. Exercises are being scheduled for the remainder of 2010 to meet any annual or triennial criteria that have not yet been satisfied in the calendar year.

Facility Response Plan (FRP) Updates:

Enbridge has recently reviewed and updated our Facility Response Plan in each Response Zone as follows:

Superior Region Response Zone (OPS Sequence Number #866):

Due to new pipeline construction that constituted substantial new operating conditions, Enbridge completed a thorough review and update of our FRP in conjunction with our



regular annual review process in April of 2010. At that time, we submitted the following to the Pipeline and Hazardous Materials Safety Administration:

- (1) Facility Response Plan revisions; and
- (2) A complete Facility Response Zone Questionnaire.

In relation to the Advisory Bulletin, we have reassessed our FRP and concluded that our plan is complete, complies with 49 CFR Part 194 and is appropriate for responding to a worst case discharge in our Superior Region Response Zone.

North Dakota Region Response Zone (OPS Sequence Number #665):

Due to a change of the Qualified Individual, and in conjunction with our annual review process, Enbridge completed a thorough review and update of our North Dakota Region Response Zone Facility Response Plan in May of 2009. We submitted the following to the Pipeline and Hazardous Materials Safety Administration:

- (1) Facility Response Plan revisions in May of 2009; and
- (2) A complete Facility Response Zone Questionnaire in June of 2009.

Subsequently in April of 2010, Enbridge completed a thorough annual review and update of our North Dakota Response Zone Facility Response Plan. We submitted the FRP revisions that were generated from this review to the Hazardous Materials Safety Administration at that time, even though there were no substantial new conditions or changes that would affect the implementation of the response plan.

In relation to the Advisory Bulletin, we have reassessed our FRP and concluded that our plan is complete, complies with 49 CFR Part 194 and is appropriate for responding to a worst case discharge in our North Dakota Region Response Zone.

Chicago Region Response Zone (OPS Sequence Number #867):

Due to new pipeline construction that constituted substantial new operating conditions, Enbridge completed a thorough review and update of our FRP in conjunction with our regular annual review process in April of 2010. At that time, we submitted the following to the Pipeline and Hazardous Materials Safety Administration:

- (1) Facility Response Plan revisions; and
- (2) A complete Facility Response Zone Questionnaire.

In relation to the Advisory Bulletin, we have reassessed our FRP and concluded that our plan is complete, complies with 49 CFR part 194 and is appropriate for responding to a worst case discharge in our Chicago Region Response Zone and complies with 49 CFR Part 194.



Cushing Region Response Zone (OPS Sequence Number #1666):

Due to substantial new operating conditions, Enbridge completed a thorough review and update of our FRP in conjunction with our regular annual review process in May of 2009. We submitted the following to the Pipeline and Hazardous Materials Safety Administration:

- (1) Facility Response Plan revisions in May of 2009; and
- (2) A complete Facility Response Zone Questionnaire in June of 2009.

In addition, we have recently completed our 2010 annual review of the Cushing Region FRP. Although there were no substantial new conditions or changes that would affect the implementation of the response plan, we submitted the following to the Pipeline and Hazardous Materials Safety Administration:

- (1) Facility Response Plan revisions on July 16, 2010; and
- (2) A complete Facility Response Zone Questionnaire on July 21, 2010.

During our review, we considered the Advisory Bulletin and concluded that our plan is complete, complies with 49 CFR Part 194 and is appropriate for responding to a worst case discharge in our Cushing Region Response Zone.

Should you have any questions, please contact me by telephone at (780) _____ or by email at _____@enbridge.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Boisvert'.

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