



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

901 Locust Street, Suite 462
Kansas City, MO 64106-2641

VIA CERTIFIED MAIL and FAX TO: (715) 398-4803

March 18, 2011

Mr. Richard Adams
Vice President, U.S. Operations
Enbridge Energy Partners, Ltd
City Center Office
1409 Hammond Avenue
Superior, Wisconsin 54880-5247

**Re: CPF No. 3-2010-5008H; Pipeline and Hazardous Materials Safety
Administration (PHMSA) – Line 6B Integrity Verification and Remedial Workplan
(IVP) – Notice of Required Modification**

Dear Mr. Adams:

Following the failure of Enbridge's Line 6B pipeline near Marshall, Michigan, PHMSA issued a Corrective Action Order on July 28, 2010, which was subsequently amended on September 22, 2010 (Order). The Order, as amended, requires that Enbridge take corrective actions to ensure the long term safe and environmentally sound operation of the pipeline.

On September 26, 2010, Enbridge submitted a "Line 6B Integrity Verification and Remedial Work Plan" (Plan) as required by the Order. By letter dated November 1, 2010, PHMSA informed you that the long term integrity work plan was inadequate, would not accomplish the purpose of the Order to ensure that additional failures do not occur in the long term, and was therefore not accepted by PHMSA. Based on the information it has reviewed concerning the history of this pipeline and its current condition, PHMSA informed you that "it will likely be necessary for Enbridge to replace portions of Line 6B to accomplish the purpose of the Order to provide confidence that the line will be free from additional failures in the long term." The long term integrity work plan was unacceptable because it did not include criteria and an adequate process for considering pipe replacement as a long term solution to such integrity threats. PHMSA advised you to "submit a revised Plan specifying additional measures, including hydrostatic testing, criteria and procedures for replacing pipe where appropriate, and any other actions deemed necessary by Enbridge and incorporate them into the Plan with sufficient technical detail to permit an evaluation by PHMSA of whether the Plan will accomplish the long-term safe and environmentally sound operation of the pipeline."

Mr. Richard Adams
March 11, 2011

To date, however, Enbridge has failed to submit such a revised plan. While we appreciate your general intentions to perform certain repairs as described in your February 17, 2011, letter, this letter does not constitute a long term integrity work plan. PHMSA maintains that a technically sound long term strategy for the safe operation of Line 6B needs to include provisions for hydrostatic testing and pipe replacement in order to account for the uncertainties associated with ILI defect detection and to mitigate the integrity threats associated with the disbanded polyethylene tape coating on Line 6B. In particular, the hydrostatic testing should be performed as soon as practicable following completion of the short/near term integrity verifications from the most recent ILI inspections, and not more than two years prior to the next scheduled crack inspection (2013).

Accordingly, as provided in Item 11(d) of the Order, Enbridge is directed to modify the Plan to include the above measures. The modified Plan must include sufficient technical detail to permit an appropriate evaluation by PHMSA of whether the Plan will accomplish the long term safe and environmentally sound operation of the pipeline. Be advised that failure to submit a revised long term integrity work plan acceptable to PHMSA may constitute non-compliance with the CAO and may result in further enforcement action.

Submit the modified Plan to my office by 5:00 pm (EDT) on April 15, 2011, electronically in Microsoft Word format. Include any supplemental actions Enbridge determines are necessary in addition to the actions described above. I will then review the revised Plan. I may direct Enbridge to make corrections or additional modifications to the plan. PHMSA reserves the right to disapprove, comment, or direct modification of any plan provision upon resubmission. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. A. Barrett', written over a horizontal line.

David Barrett
Director, Central Region, PHMSA

Cc: Shaun G. Kavajecz, Manager, Pipeline Safety Compliance, Enbridge Pipelines
(Lakehead) L.L.C., 119 N. 25th Street E., Superior, Wisconsin 54880