



Enbridge Pipelines Inc.
30th Floor
425 – 1st Street SW
Calgary, AB T2P 3L8
Canada
www.enbridge.com

Jesse Ho
Senior Regulatory Analyst
Regulatory Law & Affairs
Tel: 403-767-4581
Fax: 403-767-3863
Email: jesse.ho@enbridge.com

August 15, 2014

E-FILE

National Energy Board
517 – 10th Avenue SW
Calgary, AB T2R 0A8

Attention: Sheri Young, Secretary of the Board

Dear Ms. Young:

**Re: Enbridge Pipelines Inc. (“Enbridge”)
Line 9B Reversal and Line 9 Capacity Expansion Project
File No. OF-Fac-Oil-E101-2012-10 02
Order XO-E101-003-2014
Condition 10: Repair of Features in Line 9 between Sarnia and Montreal Terminals**

Enbridge has been working to repair all features in Line 9 between Sarnia Terminal and Montreal Terminal, as specified in Condition 10 of National Energy Board (“NEB”) Order XO-E101-003-2014 (the “Order”). The features selected for repair were identified through additional assessments and/or re-assessments to which Enbridge committed in the Line 9B Reversal and Line 9 Capacity Expansion Project (“Project”) Application. These repairs are based on the maximum operating pressure (“MOP”) and integrity status information presented in the Updated Engineering Assessment (“Updated EA”) submitted pursuant to Condition 9 of the Order¹. Features were selected for repair based on the CSA Z662-11 repair criteria and/or to ensure a safety factor of greater than 125% of the MOP during pipeline operation.

Enbridge has reviewed the integrity dig trending for all digs completed to date for which field data is available. This review has confirmed that the trending for all digs completed after the Updated EA was submitted have supported the initial trending analysis presented in section 4.3.3.1 (Excavation Program Recalibration) and section 4.3.6 (Depth and Predicted Failure Pressure Trending) of the Updated EA.

Enbridge has also reviewed the overall selection of features for excavation to ensure that a sufficient quantity of each category of features has been investigated. The initial statistical analysis was presented in section 4.3.4 (Statistical Evaluation of Dig Program) of the Updated EA. The analysis for all digs completed to date for which filed data is available shows that the current excavation program has achieved a statistical confidence of >99% for reported crack

¹ The Line 9B Reversal and Line 9 Capacity Expansion Project [Updated Pipeline Engineering Assessment](#) was filed with the National Energy Board on June 16, 2014, filing ID A61068

field, notch-like and crack-like features on all segments between Sarnia Terminal and Montreal Terminal. Thus the selected features are well representative of the entire feature population.

Appendices A, B and C provide a list of the features repaired with details such as location, feature size, safety factor prior to repair, and repair date. They present data collected from the In-Line Inspection tools as well as field data collected during non-destructive examination assessments. Appendix A provides information with respect to deformations, Appendix B crack features, and Appendix C corrosion features.

Enbridge has developed mechanical damage (deformation) excavation and field assessment criteria based on Enbridge and industry experience and regulatory requirements as described in section 4.4.2 (Mechanical Damage Inspection) of Enbridge's updated EA. The Enbridge excavation criteria applicable to mechanical damage programs on this pipeline are based on the depth of the feature with respect to the outer diameter ("OD") of the pipe and position of the feature on the pipe. The criteria are also based on the feature's interaction with welds and other features such as cracks, metal loss, or other mechanical damage. Due to the complex nature of mechanical damage features, Enbridge does not quantify the severity of these features based on factors such as failure pressures or specified minimum yield strength ("SMYS"). As a result mechanical damage features provided in Appendix A, do not include safety factors. Pursuant to Condition 1 of the Order, Enbridge respectfully requests relief from the requirement from Condition 10 b) to provide the safety factors prior to repair, associated with deformation features along Line 9.

As of August 15, 2014, Enbridge has completed 985 out of 989 integrity digs and repaired the associated features identified that meet the criteria in Condition 10 of the Order. In addition to those features, minor features which were not an immediate pipeline integrity threat were repaired in the field when exposed during an integrity dig to further ensure the safety of the pipeline. Due to delays in receiving environmental permitting or delays caused by other extenuating circumstances related to very complex excavations, as further described in Table 1 below, there are currently four outstanding digs that have not yet been completed. In addition there are currently recently completed integrity digs that require final review of the field data to provide the information required by Condition 10 (set out in Appendices A, B and C) for the list of the features repaired.

Pursuant to Condition 1 of the Order, Enbridge respectfully requests relief from the timing set out in Condition 10 for the completion of these four remaining integrity digs and associated features due to these extenuating circumstances, and for the provision of the data relating to the recently completed integrity digs. Enbridge respectfully requests that it be permitted to file confirmation of the completion of three of these remaining digs and the reporting of field data for the recently completed digs when or before Enbridge applies for Leave to Open for the Project. For the fourth remaining integrity dig at KP 3633.98, Enbridge requests that it be permitted to file confirmation of the completion of that dig prior to the Project going into service for the reasons set out in Table 1.

Table 1 – Line 9 Integrity Digs to be Completed Prior to Leave to Open and Rationale for Delay

Segment	Girth Weld	ROW KP	Planned Completion Date	Extenuating Circumstances Resulting in a Dig Completion Delay
HL-NW	153180	3042.72	9/13/2014	This dig is located on the slope of the Credit Valley. There have been significant delays in receiving the required permit from the Credit Valley Conservation Authority to commence this dig. The permit is not forecasted to be issued until August 25, 2014 and therefore this dig cannot be completed until September 13, 2014.
HL-NW	36630	3173.21	9/13/2014	This dig was selected for a cutout repair after the initial non-destructive examination assessment. The cutout will receive a metallurgical assessment in order to provide further statistical data to support Enbridge's ongoing Integrity Management Program. The duration for a cutout repair is significantly longer than for other repair methods due to the time required for procurement of the replacement pipe. As a result of this procurement delay, this dig cannot be completed until September 13, 2014.
ML-CD	93390	3532.31	9/7/2014	The Province of Quebec's Environment agency ("MDDEFP") will not allow access to this dig site before August 15, 2014 due to site specific environmental concerns. As a result of this restriction, this dig cannot be completed until September 7, 2014.
ML-CD	2270	3633.98	Prior to ISD	The pipeline is located in Montreal and is approximately seven feet away from a three-story apartment building that was constructed after Line 9 was installed. The top of the pipe is approximately 17 feet deep and the excavation is in close proximity (approximately 10 feet) to a road. Extensive engineering and geotechnical studies have been performed to ensure that the work can be conducted safely without adversely affecting the adjacent apartment building and road. An overhead power line crosses the excavation area and has to be re-routed by the public utility (Hydro Quebec). The re-routing of this power line still remains to be completed and has prevented excavation from commencing and caused a significant delay to the completion date of this dig. Based on recent discussions with Hydro Quebec, Enbridge understands the power line may not be moved until after September 15. As a result of this power line relocation delay, this dig cannot be completed until after September 15, 2014, and Enbridge will confirm completion of this dig prior to the Project going into service.

Enbridge will complete the above-listed integrity digs and provide confirmation of their completion to the NEB as soon as the digs are completed, and no later than the date Enbridge

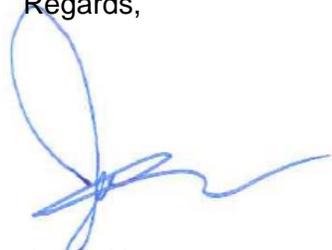
files its final application for Leave to Open for the Project, and, in the case of the integrity dig at KP 3633.98, prior to the Project going into service.

A copy of this letter and Appendices A, B and C will be made available in French and posted on Enbridge's Line 9 website at the following link:

http://www.enbridge.com/ECRAI_FR/Line9BReversalProject_FR/RegulatoryInformation.aspx

If the Board requires additional information, please contact me at (403) 767-4581 or Margery Fowke, Director, Regulatory Law at (403) 266-7907.

Regards,

A handwritten signature in blue ink, appearing to read 'Jesse Ho', with a long horizontal flourish extending to the right.

Jesse Ho
Senior Regulatory Analyst

Enclosure