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November 23, 2007

## Filed Electronically Original by Courier

Ms. Claudine Dutil-Berry Secretary **National Energy Board** 444 – 7<sup>th</sup> Avenue S.W. Calgary, Alberta T2P 0X8

Dear Ms. Dutil-Berry:

## Re: Westcoast Energy Inc. ("Westcoast") McMahon Processing Plant Train 5 Reactivation

Enclosed for filing with the National Energy Board is a notification pursuant to Section 43 of the Processing Plant Regulations that Westcoast plans to reactivate gas treating Train 5 at the McMahon Processing Plant.

Yours truly,

**Original Signed by** 

Mel Thorp

Enclosure

cc: Section 58 Interested Parties

# MCMAHON PROCESSING PLANT TRAIN 5 REACTIVATION

### Reactivation

Westcoast Energy Inc. ("Westcoast") hereby gives notice pursuant to Section 43 of the National Energy Board Processing Plant Regulations that it is planning to reactivate gas treating Train 5 at its McMahon Processing Plant located at Taylor, B.C. Westcoast anticipates completing the required reactivation work in or about April 2008.

### Justification for Reactivation

The McMahon Processing Plant contains six natural gas processing trains. Train 5 was deactivated in May 2001 when demand for gas processing services declined and this enabled Westcoast to reduce operating costs and make the overall operation of the plant more efficient. From 2001 to the present Trains 1, 2, 3, 4 and 6 have continued to operate in the ordinary course.

With a continual increase in current and future demand for processing service at the McMahon facility, reactivation of Train 5 will provide operational and maintenance flexibility and reduce the impact to shippers during the 2008 planned plant outage. Reactivation of this train prior to the 2008 outage will allow preliminary work to be completed on the existing trains outside the outage window, thus addressing work congestion, safety matters, timeline and impact to customers. It will also provide an opportunity to utilize this train in the event there are delays during start up after the outage.

Once reactivated, Train 5 will be reintegrated into the established operation of the McMahon Processing Plant, including Trains 1, 2, 3, 4 and 6.

#### Assessment of Condition

Train 5 went through a total outage in the spring of 2001. At that time Train 5 was drained, steamed and chemically washed. Minor repairs were noted but not completed at the time. The train was then sealed, purged with nitrogen, and left with a positive pressure nitrogen blanket.

It has since been determined that the pressure of the nitrogen blanket has decreased to atmospheric pressure but the gas inside the vessel is still inert. Visual, ultrasonic inspections and other NDE assessments were conducted in September 2007. It was concluded that the contactor and still are fit for service as per API 510 and applicable codes.

As a result of the September 2007 inspection, the following items were found to be in need of replacement:

- the reflux accumulator in which hydrogen blisters are forming due to age and  $H_2S$  content in the vessel;
- the tube bundles in the east and west amine reboilers; and
- the amine reflux condenser bundle.

The following outlines the items to be completed prior to reactivation:

- Review/update of established operating procedures
- Review/update of T5 Blind lists and Lock out clearance forms

- Review/update of T5 Confined Space Hazard Assessments
- Review/update of Confined Space Rescue and Ventilation Plans
- Replacement of reflux accumulator
- Replacement of east and west reboiler bundles including O/H condenser bundle
- Inspection and rebuild of all control valves and instrumentation
- Servicing and certification of all safety valves (PSVs)
- Inspect/servicing of all rotating equipment
- Replacement of lean/rich exchanger plate packs (piping modifications required)
- Replacement and relocation of contactor inlet check valve (known safety hazard)
- Minor tray repairs
- Visual inspection of reboilers and reflux condenser shells as per API 510 and Westcoast's Process Plant Integrity Program (PPIP)
- Metalizing to mitigate known areas of corrosion
- Final cleaning
- Final visual inspection
- Sign-off from the Area Director, Steam Chief and Integrity Department

Prior to reactivation, Train 5 will be fit for service as per API 510, applicable codes and Westcoast's Process Plant Integrity Program.

## **Reactivation Process**

The existing McMahon Plant Management of Change process will be followed while preparing the train for reactivation. All operations and maintenance work will follow existing Safe Work Practices and established plant processes. Westcoast does not anticipate any environmental or socio-economic impacts associated with the reactivation as all work activity will be carried out primarily within existing buildings at the plant site.