



December 7, 2018

**VIA: Electronic Mail & FedEx**

Mr. Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
US Department of Transportation  
820 Bear Tavern Road, Suite 103  
Trenton, NJ, 08628

**Re: CPF-1-2018-5031M  
Notice of Amendment**

Mr. Burrough,

The Notice of Amendment (NOA) referenced above and dated November 6, 2018 was received by Sunoco Pipeline L.P. (SPLP) on November 7, 2018 via electronic mail. SPLP is a wholly owned subsidiary of Energy Transfer (ET). SPLP had 30 days to respond to the NOA.

SPLP submits with this cover letter a copy of the Energy Transfer Standard HL4.0103 'Pipeline Construction' and Welding Procedure ETC-A112A. Energy Transfer and Sunoco Pipeline merged in 2017 and as such all projects to be constructed under the combined organization will follow Energy Transfer Engineering Standards and Welding Procedures.

Energy Transfer Standard HL4.0103, Section 2.0 'Scope' identifies "HDD Boring" as a Construction Task that requires Inspection and Section 4.22.19 'Pullback Operations' identifies specific actions related to HDD pullback operations and associated pipe inspection.

Energy Transfer welding procedure ETC-A112A identifies the maximum amount of time between 2<sup>nd</sup> bead and start of other beads.

SPLP believes that these documents adequately address the findings identified in the subject NOA.

Should you have any questions or concerns please contact me at (713) 989-7126 or via email at [todd.nardozzi@energytransfer.com](mailto:todd.nardozzi@energytransfer.com).

Sincerely,

Todd Nardozzi  
Sr. Manager – DOT Compliance  
Energy Transfer

cc: D. Nichols