



January 20, 2020

Via: Electronic Mail & FedEx

Robert Burrough, Director
Eastern Region
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
840 Bear Tavern Road, Suite 300
West Trenton, New Jersey 08628

Re: Energy Transfer Company
Notice of Amendment
CPF 1-2019-5010M

Dear Mr. Burrough:

Pursuant to 49 C.F.R. Part 190.206, Energy Transfer Company (ET or Company) submits this written response to a Notice of Amendment (NOA) issued on November 26, 2019, by the Pipeline and Hazardous Materials Safety Administration (PHMSA). The NOA was received by ET on December 2, 2019. PHMSA's NOA identified nine (9) apparent inadequacies within ET's Hazardous Liquid Standard Operating Procedures (SOPs). The NOA provided for 30 days from receipt of the notice to submit written comments, revised procedures or request a hearing under 190.211 and also provided for 60 days from receipt to submit amended procedures. On December 27, 2019 ET requested an extension of time until January 20, 2020 to respond and until February 19, 2020 to provide amended procedures to PHMSA for review. This request was approved by PHMSA via written correspondence dated January 3, 2020.

By way of background, this NOA was issued following an inspection of the ET Hazardous Liquid procedures for operations & maintenance in Houston, Texas on September 10-12, 2019. The apparent inadequacies in NOA concern requirements that apply to low-stress pipelines in rural areas set forth in 49 C.F.R. Part 195.12 and various requirements for procedural manuals for operations, maintenance and emergencies found in 195.402.

ET has reviewed the PHMSA NOA and agrees to revise all applicable SOPs to address the nine (9) apparent inadequacies and will provide the revised documents to PHMSA on or prior to February 19, 2020.

ET shares PHMSA's commitment to pipeline safety, public safety, and pipeline integrity. Should you have any questions or concerns please contact me at (713) 989-7126 or via email at todd.nardozzi@energytransfer.com.

Sincerely,

Todd Nardozzi
Sr. Manager – DOT Compliance

cc: Eric Amundsen, SVP - Operations
Greg McIlwain, SVP - Operations
Chris Lason, VP - Asset Integrity
Mark Milliken, VP – Technical Services
Danny Nichols, Sr. Director Regulatory Compliance