



November 10, 2020

Mr. Gregory A. Ochs
Acting Director, Central Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
901 Locust Street, Suite 480
Kansas City, Missouri 64106

RE: PHMSA Notice of Amendment CPF 3-2020-1006M

Dear Mr. Ochs,

The Notice of Amendment (NOA) referenced above was received by Panhandle Eastern Pipeline (PEPL or Company), which is a wholly owned subsidiary of Energy Transfer (ET), on September 28, 2020 via electronic mail. The NOA directs that “*PEPL must amend its procedure A.17 Section 7.2 to always include consequences in establishing notification distances for its public stakeholder audience.*” While PEPL disagrees with the assertion in the NOA regarding the adequacy of its Public Awareness Program, it is not contesting the NOA as it has already made revisions that it believes comply with the desired outcome of the NOA. The NOA provided 45 days to provide amended procedures if the Company was not contesting the findings, thus this response is timely.

Pursuant to the above-referenced NOA, PEPL submits with this letter a copy of the recently revised Company Public Awareness Plan, Standard Operating Procedure (SOP) A.17, which is applicable for natural gas pipelines and related facilities and part of the Public Awareness Program for PEPL. The SOP was updated and published on June 15, 2020, prior to the receipt of the NOA. Below is an excerpt of the relevant communication coverage area for targeted mail distribution to notify affected public stakeholders, referred to as “buffer distances.”

In determining appropriate buffers for its pipelines, the Company undertook a comprehensive evaluation of a variety of factors related to a pipeline’s location and release consequences, including but not limited to, Potential Impact Radius (PIR) calculations, product release characteristics, agency guidance, industry practices, best communications practices, stakeholder needs, and the Company’s broader communications and engagement program. Consistent with API RP 1162 provisions incorporated by 49 C.F.R. § 192.616, where specific circumstances suggest a wider communications coverage area for a pipeline location beyond six hundred and sixty (660) feet, the Company considers whether to tailor the coverage area to fit a pipeline’s location and release consequences and expands the coverage area as appropriate based on (1) the product transported and (2) related release characteristics.

As set forth below, the Company establishes the buffer distance for natural gas pipelines based on pipeline-specific PIR calculation prepared under the Company’s integrity management program (IMP). Specifically, the buffer distance for PEPL is the PIR, with a minimum distance of six hundred and sixty (660) feet on either side of the pipeline.



**Excerpt from Energy Transfer Public Awareness Plan, Standard Operating Procedure A.17
[Section 7.2, pages 11-12]**

The company's communication coverage area for targeted mail distribution to notify Affected Public stakeholders is defined as outlined below.

Product Type	Buffer distance
Natural Gas	Potential Impact Radius (PIR) as calculated by Pipeline Integrity. Minimum of 660 feet on either side of pipeline.

PEPL believes that this submission, including this letter and the attached SOP A.17, adequately satisfies the requirements of the NOA. Should you have any questions or concerns, please contact me at (713) 989-7126 or by email at todd.nardozzi@energytransfer.com.

Respectfully Submitted,

**Todd
Nardozzi**

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Todd Nardozzi
Director – Regulatory Compliance
Energy Transfer / Panhandle Eastern Pipeline,
L.P.

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