June 9, 2021

VIA ELECTRONIC MAIL TO: matthew.ramsey@energytransfer.com

Mr. Matthew Ramsey  
Chief Operating Officer  
Energy Transfer, LP  
8111 Westchester  
Dallas, Texas 75225

Re: CPF No. 3-2021-009-NOPV

Dear Mr. Ramsey:

Enclosed please find the Final Order issued in the above-referenced case. It makes a finding of violation against your subsidiary, Rose Rock Midstream Operating, LLC, and finds that the civil penalty amount of $32,800 has been paid in full. This case is now closed. Service of the Final Order by electronic mail is effective upon the date of transmission as provided under 49 C.F.R. § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

Enclosures (Final Order and NOPV)

cc: Mr. Gregory Ochs, Director, Central Region, Office of Pipeline Safety, PHMSA  
Mr. Todd Nardozzi, Director, Regulatory Compliance, Energy Transfer, LP, todd.nardozzi@energytransfer.com  
Mr. Greg McIlwain, Senior Vice President, Operations, Energy Transfer, LP, gregory.mcilwain@energytransfer.com

CONFIRMATION OF RECEIPT REQUESTED
U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, D.C. 20590

In the Matter of)
)
Rose Rock Midstream Operating, LLC, a subsidiary of Energy Transfer, LP,
)
Respondent.
)

FINAL ORDER

On March 9, 2021, pursuant to 49 C.F.R. § 190.207, the Director, Central Region, Office of Pipeline Safety (OPS), issued a Notice of Probable Violation and Proposed Civil Penalty (Notice) to Energy Transfer, LP’s subsidiary, Rose Rock Midstream Operating, LLC (Respondent). The Notice proposed finding that Respondent had violated the pipeline safety regulations in 49 C.F.R. Part 195 and proposed a civil penalty of $32,800. Respondent did not contest the allegation of violation and paid the proposed civil penalty on April 12, 2021. In accordance with § 190.208(a)(1), such payment authorizes the entry of this final order.

Based upon a review of all of the evidence, pursuant to § 190.213, I find Respondent violated the pipeline safety regulations listed below, as more fully described in the enclosed Notice, which is incorporated by reference:

49 C.F.R. § 195.310 (Item 1) — Respondent failed to retain pressure test records as required by § 195.310. Specifically, Respondent could not provide hydrostatic test records for Tank 1004 at the Platteville tank farm in the Wattenberg system.

This finding of violation will be considered a prior offense in any subsequent enforcement action taken against Respondent. In accordance with 49 C.F.R. § 190.223, Respondent is assessed the proposed civil penalty amount of $32,800, which Respondent has already paid in full.

The terms and conditions of this order are effective upon service in accordance with 49 C.F.R. § 190.5.

ALAN KRAMER
MAYBERRY

Digitally signed by ALAN KRAMER
Date: 2021.06.08 15:51:25 -04'00'

June 9, 2021

Alan K. Mayberry
Associate Administrator
for Pipeline Safety
NOTICE OF PROBABLE VIOLATION
PROPOSED CIVIL PENALTY

VIA ELECTRONIC MAIL TO: matthew.ramsey@energytransfer.com, gregory.mcilwain@energytransfer.com and todd.nardozzi@energytransfer.com.

March 9, 2021

Mr. Matt Ramsey
Chief Operating Officer
Energy Transfer Partners, LLC
8111 Westchester
Dallas, TX 75225

CPF 3-2021-009-NOPV

Dear Mr. Ramsey:

From September 29 through November 16, 2020, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected the field assets and records of your subsidiaries, Rose Rock Midstream, L.P. (Rose Rock), and White Cliffs Pipeline, LLC, both virtually and onsite, in Colorado and Kansas.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:
1. § 195.310 Records.
   (a) A record must be made of each pressure test required by this subpart, and the record of the latest test must be retained as long as the facility tested is in use.

Rose Rock failed to provide pressure test records as required by § 195.310. Specifically, Rose Rock failed to provide hydrostatic test records for Tank 1004 at the Platteville tank farm in the Wattenberg system during the records inspection.

Proposed Civil Penalty

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed $222,504 per violation per day the violation persists, up to a maximum of $2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed $218,647 per violation per day the violation persists, up to a maximum of $2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed $213,268 per violation per day, with a maximum penalty not to exceed $2,132,679. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed $209,002 per violation per day, with a maximum penalty not to exceed $2,090,022.

We have reviewed the circumstances and supporting documentation involved for the above probable violation(s) and recommend that you be preliminarily assessed a civil penalty of $32,800 as follows:

<table>
<thead>
<tr>
<th>Item number</th>
<th>PENALTY</th>
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<tbody>
<tr>
<td>1</td>
<td>$32,800</td>
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Response to this Notice

Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Enforcement Proceedings. Please refer to this document and note the response options. All material you submit in response to this enforcement action may be made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, or request a hearing under 49 CFR § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order. If you are responding to this Notice, we propose that
you submit your correspondence to my office within 30 days from receipt of this Notice. This period may be extended by written request for good cause.

In your correspondence on this matter, please refer to CPF 3-2021-009-NOPV and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Gregory A. Ochs
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration

Enclosures: Response Options for Pipeline Operators in Enforcement Proceedings

CC: Mr. Gregory Mcilwain, Operations VP, Energy Transfer Partners, LLC, gregory.mcilwain@energytransfer.com, Mr. Todd Nardozzi, Director Regulatory Compliance, Energy Transfer Partners, LLC, todd.nardozzi@energytransfer.com