



**Sunoco Logistics**

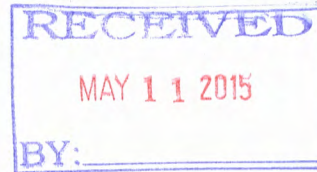


**Sunoco Pipeline L.P.**  
One Fluor Daniel Drive  
Building A, Level 3  
Sugar Land, TX 77478

May 8, 2015

**VIA: Electronic Mail and FedEx**

Mr. Rod Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
8701 South Gessner Rd.  
Suite 1110  
Houston, TX 77074



**Re: CPF No. 4-2015-5009**  
**West Texas Gulf – Wortham, TX Accident – February 19, 2013**

Dear Mr. Seeley:

On April 8, 2015, PHMSA issued a Notice of Probable Violation, Proposed Civil Penalty and Proposed Compliance Order to Sunoco Pipeline L.P. (SPLP). SPLP timely provides this response summarizing the status of its efforts to resolve all items of the NOPV and Compliance Order and respectfully requests confirmation from the Region that all items have been fulfilled.

No. 1 of the Compliance Order provided: "In regard to Item Number 2 of the Notice pertaining to Sunoco's failure to submit DOT Form 7000-1 for the accident that occurred on or about February 19, 2013, Sunoco shall submit Form 7000-1 within 10 calendar days of the issuance of this Final Order. Additionally, Sunoco shall provide to PHMSA any incident investigation report(s) completed by Sunoco, and identify any corrective action(s) taken to date to prevent recurrence of a similar event."

The incident investigation report was submitted to PHMSA via electronic mail on April 17, 2015.

Attached to this submission is the Original/Final DOT 7000-1 report. This report was entered through the ODES 2.0 system on May 8, 2015.

SPLP has identified the following measure to aid in prevention of a recurrence of this type of event:

The "Event Reporting & Documentation" (HS-P-004) procedure has undergone revision and is currently in the final stages of internal review with a goal of publishing and training by the 3<sup>rd</sup> quarter 2015. The following definitions of an "event" and "event consequences" are included in this revision:

*Event* - An unplanned occurrence with a consequence that causes physical harm to people, damage to property/assets or harm to the community or environment.

*Event Consequences* – a consequence identifies what type of event occurred and may include but not limited to: (1) Injury/Illness, (2) Spill/Release, (3) Vehicle Accident, (4) Security Related, (5) Fire, or (6) Agency Inspection.



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One of the primary purposes of this procedure revision is to formalize the process to immediately, or as soon as practicable, internally notify all affected departments of an event, which includes pipeline accidents as defined by 195.50 and those accidents which require immediate notification as specified in 195.52. This notification will allow consideration of the circumstances of the event to be made by appropriate personnel. Among items to be considered are regulatory jurisdiction and corresponding reporting requirements which in turn may trigger additional actions such as telephonic notification to NRC and other regulatory agencies.

The civil penalties associated with the Probable Violations have been paid via wire transfer on May 7, 2015.

SPLP believes that the documents submitted on April 17, 2015, those submitted under this cover and the corrective actions identified above have fulfilled the Compliance Order in advance of PHMSA issuing the Final Order. Accordingly, SPLP respectfully requests that PHMSA issue a letter indicating that the terms of the Compliance Order have been fulfilled concurrently with the issuance of the Final Order.

Should you have any questions or require further information, please contact Todd Nardozzi of our Sugar Land office at 281-637-6576 or via email at [tgnardozzi@sunocologistics.com](mailto:tgnardozzi@sunocologistics.com).

Sincerely,

David R. Chalson  
Sr. Vice President, Operations  
Sunoco Pipeline L.P.

Cc: Kevin Dunleavy, Leif Jensen