

October 10, 2019

Mr. Kelcy Warren
Chief Executive Officer
Energy Transfer, LP
8111 Westchester Drive
Dallas, Texas 75225

Re: CPF No. 4-2019-1005

Dear Mr. Warren:

Enclosed please find the Final Order issued in the above-referenced case. It makes a finding of violation and specifies actions that need to be taken by Trunkline Gas Company, LLC, a subsidiary of Energy Transfer, LP, to comply with the pipeline safety regulations. When the terms of the compliance order are completed, as determined by the Director, Southwest Region, this enforcement action will be closed. Service of the Final Order by certified mail is effective upon the date of mailing, 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: Ms. Mary McDaniel, Director, Southwest Region, Office of Pipeline Safety, PHMSA
Mr. Mark Milliken, Senior Director, Technical Services, Energy Transfer, LP, 8111
Westchester Drive, Dallas, Texas 75225
Mr. Eric Amundsen, Senior Vice President – Operations, Energy Transfer, LP, 8111
Westchester Drive, Dallas, Texas 75225

CERTIFIED MAIL - RETURN 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)

Trunkline Gas Company, LLC,)
a subsidiary of Energy Transfer, LP,)

Respondent.)
_____)

CPF No. 4-2019-1005

FINAL ORDER

On April 3, 2019, pursuant to 49 C.F.R. § 190.207, the Director, Southwest Region, Office of Pipeline Safety (OPS), issued a Notice of Probable Violation (Notice) to Energy Transfer, LP, the parent company of Trunkline Gas Company, LLC (Respondent or Trunkline). The Notice proposed finding that Respondent had violated a pipeline safety regulation in 49 C.F.R. Part 192 and proposed certain measures to correct the violation. Trunkline responded to the Notice on April 30, 2019, and did not contest the allegation of violation or proposed corrective measures. On August 29, 2019, Trunkline submitted a supplemental response that described the steps it has taken to comply with the proposed compliance terms included in the Notice.

Based upon a review of all of the evidence, pursuant to § 190.213, I find Respondent violated the pipeline safety regulation listed below, as more fully described in the Notice attached hereto as Exhibit A:

49 C.F.R. § 192.905(b)(1) (**Item 1**) — Respondent failed to identify two high consequence area sites on its Cypress Discharge segment when it failed to follow its written SOP B.13 *Surveillance For Class Location and HCA Determination*, referenced in its Pipeline Integrity Management Plan, Section 3-Identification of High Consequence Areas (HCAs) & Identified Sites, and *Best Practice B.17 Determining High Consequence Areas*, referenced by SOP B.13.

This finding of violation will be considered a prior offense in any subsequent enforcement action taken against Respondent.

Pursuant to 49 U.S.C. § 60118(b) and 49 C.F.R. § 190.217, Respondent is ordered to take the actions proposed in the enclosed Notice to correct the violation. The Director may grant an extension of time to comply with any of the required items upon a written request timely submitted by the Respondent and demonstrating good cause for an extension. Upon completion of ordered actions, Respondent may request that the Director close the case. Failure to comply

with this Order may result in the assessment of civil penalties under 49 C.F.R. § 190.223 or in referral to the Attorney General for appropriate relief in a district court of the United States.

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

October 10, 2019

Alan K. Mayberry
Associate Administrator
for Pipeline Safety

Date Issued