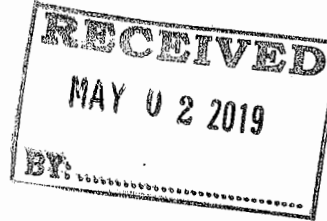




April 30, 2019

VIA: Certified Mail Courier



Ms. Mary McDaniel, P.E.  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
US Department of Transportation  
8701 South Gessner, Suite 630  
Houston, Texas 77074

Re: CPF-4-2019-1005  
Notice of Probable Violation and Proposed Compliance Order

Dear Ms. McDaniel:

The Notice of Probable Violation (NOPV) and Proposed Compliance Order (PCO) referenced above, dated April 3, 2019, was received by Energy Transfer LP (ET) on April 4, 2019 via certified mail. The NOPV and PCO was in response to an inspection of Trunkline Gas Company's (Trunkline) operating procedures, integrity management plan, records and field evaluations in Texas, Louisiana, Arkansas, Mississippi, Kentucky, Tennessee, Indiana, and Illinois. Trunkline is a wholly owned subsidiary of ET.

The Proposed Compliance Order requires Trunkline to provide additional training to personnel involved in the surveillance, data collection activities and analysis required to determine high consequence areas within 90 days of the date of the Final Order and also requests (not mandates) Trunkline to maintain documentation of the safety improvement costs associated with fulfilling the Compliance Order.

In response to the NOPV, Trunkline submits the following response to item number 1 of the NOPV:

1. §192.905 How does an operator identify a high consequence area?

(b)(1) Identified sites. An operator must identify an identified site, for purposes of this subpart, from information the operator has obtained from routine operation and maintenance activities and from public officials with safety or emergency response or planning responsibilities who indicate to the operator that they know of locations

that meet the identified site criteria. These public officials could include officials on a local emergency planning commission or relevant Native American tribal officials.

Trunkline failed to identify two sites as High Consequence Areas (HCA) on their Cypress Discharge segment. Trunkline failed to follow their written SOP *B.13 Surveillance for Class Location and HCA Determination* referenced in their Pipeline Integrity Management Plan Section 3 Identification of High Consequence Area (HCAs) & Identified Sites, and *Best Practice B.17 Determining High Consequence Areas* referenced by SOP B.13.

Specifically, Trunkline failed to identify the Explorers Club Child Care/Preschool (Preschool) located at 22903 Springwoods Village Parkway in Spring, Texas and The Mark at City Place Springwoods Village Apartments (Village Apartments) located at 1600 Springwoods Plaza Drive in Spring, Texas which are within their calculated PIR.

In May 2018, during the review of Trunkline's high consequence area mapping, two identified sites were found within the PIR and were not classified as high consequence areas. Both sites were in Trunkline's pipeline PIR and within .3 miles of each other.

The record does not show the Preschool nor the Village Apartments were visited by personnel and shows an Occupancy Count was not confirmed as required by Trunkline's SOP *B.13 Surveillance for Class Location and HCA Determination* and *Best Practice B.17 Determining High Consequence Areas*. Trunkline's HCA maps, Forms, HCA Tracker, surveillance, along with PHMSA's ArcMap, and NPMS confirm Trunkline failed to identify HCA sites by failing to follow their IMP process and SOP manual.

**Trunkline Response:**

Trunkline acknowledges it failed to follow its procedures to timely identify the two sites described above on the Cypress Discharge segment. As detailed in Trunkline's response to the Proposed Compliance Order below, Trunkline will administer training to the personnel involved in the surveillance, data collection activities and analysis required to determine high consequence areas to prevent reoccurrence.

Further, in response to the Proposed Compliance Order, Trunkline submits the following responses to items 1 and 2 of the PCO, respectively:

1. In regard to Item Number 1 of the Notice pertaining to failing to identify sites as High Consequence Areas, Trunkline must provide additional training to their personnel involved in the surveillance, data collection activities and analysis required to determine high consequence areas.

Trunkline must complete the required additional training within 90 days of the date of the Final Order and provide PHMSA Southwest Region with documentation confirming Item 1 has been achieved.

**Trunkline Response:**

Trunkline will provide additional training to the personnel involved in the surveillance, data collection activities and analysis required to determine high consequence areas. This training will occur within 90 days of the date of the Final Order and documentation confirming the completion of the training will be provided to the PHMSA Southwest Region Director.

2. It is requested (not mandated) that Trunkline Gas Company maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Mary McDaniel, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.

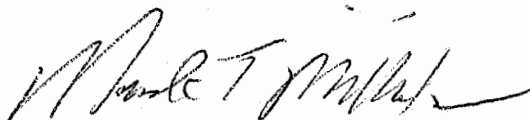
**Trunkline Response:**

Trunkline expects minimal associated costs for the training required to satisfy the requirements for this PCO.

Trunkline believes that this response adequately addresses the findings identified in the subject NOPV and satisfies the PCO.

Should you have any questions or concerns, please contact me at (713) 989-7000.

Respectfully submitted,



Mark Milliken  
Sr. Director – Technical Services  
Energy Transfer