



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

September 18, 2020

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

Matthew Ramsey
Chief Operating Officer
Energy Transfer Partners, LP
8111 Westchester Drive
Dallas, Texas 75225

CPF No. 4-2020-008-CAO

Dear Mr. Ramsey:

Enclosed please find a Corrective Action Order (CAO) issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), in the above-referenced case. It requires Florida Gas Transmission Company, which is operated by Energy Transfer Partners, LP, to take certain corrective actions with respect to a rupture that occurred on the 12-inch Sanford Lateral located in Sanford, Florida.

Service of the CAO by electronic transmission is deemed complete upon transmission and acknowledgement of receipt, or as otherwise provided under 49 C.F.R. § 190.5. The terms and conditions of this Order are effective upon completion of service.

Sincerely,

ALAN KRAMER
MAYBERRY
Digitally signed by ALAN
KRAMER MAYBERRY
Date: 2020.09.18
14:18:18 -04'00'

Alan K. Mayberry
Associate Administrator
for Pipeline Safety

Enclosure: CAO

cc: Ms. Linda Daugherty, Deputy Associate Administrator for Field Operations, OPS
Ms. Mary McDaniel, Director, Southwestern Region, OPS
Mr. Eric Amundson, Senior Vice President, Energy Transfer Partners, LP,
eric.amundson@energytransfer.com
Ms. Kathryn Harryman, DOT Compliance, Florida Gas Transmission Company,
kathryn.harryman@energytransfer.com

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

)))))
In the Matter of)))))
Florida Gas Transmission Company,))))	CPF No. 4-2020-008-CAO
Respondent.)))))

CORRECTIVE ACTION ORDER

Purpose and Background:

This Corrective Action Order (CAO or Order) is being issued under the authority of 49 U.S.C. § 60112 to require Florida Gas Transmission Company (FGT or Respondent), which is operated by Energy Transfer Partners, LP,¹ to take the necessary corrective actions to protect the public, property, and the environment from potential hazards associated with the September 10, 2020 rupture and ignition from its 12-inch Sanford Lateral natural gas pipeline in Sanford, Florida located in Seminole County (Incident).

In the early morning of September 10, 2020, FGT’s 12-inch Sanford Lateral ruptured and subsequently ignited. Prior to the rupture, at 12:47am EDT, the line was operating at 688 pounds per square inch (psig) between the Sanford station and the DeBary station. At 12:52 am EDT, the pressure reading at Sanford dropped to 409 psig and steadily decreased from that point. FGT’s Control Room detected the drop in pressure and had the valves upstream and downstream (upstream Valve 17-22U and downstream Valve 17-216B) of the failure site manually closed. At 2:08 am EDT the line was shut in. The size of the burn area around the rupture site was determined to be 515 feet by 100 feet.

Reverse 911 notified 800 area homes and the local sheriff reported 20 homes were evacuated. The fire was extinguished, and evacuated residents were allowed to return home within hours of the Incident. There were no reports of injuries or fatalities.

Pursuant to 49 U.S.C. § 60117, PHMSA, Office of Pipeline Safety (OPS), initiated an investigation of the Incident. The preliminary findings of the agency’s ongoing investigation are as follows:

¹ FGT is an approximately 5,300-mile system that transports natural gas from South Texas to South Florida. FGT is owned by Florida Gas Transmission Company, LLC, a 100 percent owned subsidiary of Citrus Corp. Citrus Corp is a 50/50 joint venture between Kinder Morgan, Inc. and Energy Transfer Partners, LP. FGT is operated by Energy Transfer. See <https://www.kindermorgan.com/Operations/Natural-Gas/Index> (last accessed September 14, 2020).

Preliminary Findings:

- FGT initially reported the Incident to the National Response Center (NRC) at 2:24 am EDT on September 10, 2020 (NRC Report No. 1286952), indicating that Reverse 911 notified 800 area homes and that the local sheriff reported the evacuation of 20 homes when the 12-inch Sanford Lateral ruptured and ignited a fire. FGT provided an update to NRC after 48 hours that indicated an estimated release of 22 million cubic feet of natural gas and caused the evacuation of 20 homes. FGT also reported that all evacuees had returned to their homes.
- There were no injuries or fatalities associated with this Incident; however, there is burn damage to the surrounding vegetation measuring 515 feet by 100 feet. Additionally, three overhead powerlines owned by Duke Energy, that shared the right-of-way (ROW), were damaged and knocked down.
- The rupture occurred near Mile Post 15 on the 12-inch Sanford Lateral (12-inch line or Sanford Lateral) that feeds a Duke Energy Power Plant and a Sanford Florida Public Utilities (FPU) meter station.
- The Sanford Lateral was constructed in 1959 with a 12-inch nominal diameter, 0.219-inch wall thickness, X-42 grade pipe that was manufactured by Youngstown Sheet and Tube. The pipe has a low-frequency electric resistance welded (LF ERW) seam and is coated with a tape coating. The length of the 12-inch Sanford Lateral was measured at 15.9 miles by a 2019 in-line inspection (ILI) run. The Sanford Lateral is part of a larger FGT unit with a total of 654 miles.
- The Sanford Lateral was manually shut in between upstream Valve 17-22U and downstream Valve 17-216B. On the evening of September 10, 2020, FGT cut the failed 12-inch pipeline and installed a pre-tested weld cap downstream from the lateral to Sanford FPU meter station. The weld cap location is approximately 0.5 miles upstream of rupture location and downstream of a FPU lateral to two customers (Sanford West and Sanford FPU) line, allowing a return to service of the remainder of the line.
- Service has been restored to all 125 customers that initially lost service. The isolated segment of pipeline, including the site of the rupture, is approximately 1.4 miles in length and remains out of service.
- The Maximum Operating Pressure of the 12-inch Sanford Lateral is 713 psig. The operating pressure at the time of the rupture was 688 psig. The portion of the Sanford Lateral that resumed operations is currently operating at 344 psig, which is fifty percent (50%) of operating pressure at the time of rupture. This pressure restriction was put into place by FGT.
- The operator reported that it performed ILI runs of the Sanford Lateral in 2014 and 2019. ILI correlation data from these runs show corrosion growth rates as high as 17

millimeters per year. The 2019 ILI run had a large amount of corrosion indications in the vicinity of rupture, many over forty percent (40%).

- Most of the pipeline ROW appears to be located in swamp areas with heavy vegetation along its borders, making the 12-inch line more susceptible to active external corrosion than other locations. The line also reportedly has river weights in the vicinity of the rupture, and throughout the entire area where high corrosion rates are present.
- Aerial mapping and alignment sheets show a mix of sparsely populated swamp and residential and commercial properties in close proximity to ROW.
- There have been no previous reportable incidents on the Sanford Lateral. FGT reports that a 2012 rupture occurred in Melbourne, Florida and a 2014 rupture occurred in Port St. John, Florida. Both were on different pipelines in the unit that includes the Sanford Lateral. The 2012 rupture involved 1959 vintage Youngstown Tube and Steel LF ERW pipe and was classified as original manufacturing related (not weld). The 2014 rupture involved 1962 vintage LF ERW pipe manufactured by Lonestar, and was also classified original manufacturing related (not weld).
- Pre-1970 LF ERW pipe has been the focus of many studies and reviews. A final report *TTO Number 5, Integrity Management Program Delivery Order DTRS56-02-D-70036, Integrity Management Program regarding Low Frequency ERW and Lap Welded Longitudinal Seam Evaluation* (Revision 3) was prepared by Michael Baker in association with Kiefner and Associates, Inc., CorrMet Engineering Services, PC in April 2004.² The report was written to support the importance of operators correctly selecting integrity assessment methods capable of assessing seam integrity and of detecting corrosion and deformation anomalies.
- PHMSA has issued Advisory Bulletins on the safety risks of Low-Frequency Welded ERW and Flash-welded Pipe manufactured prior to 1970. It also issued Alert Notice, ALN-88-01, in January 1988, advising owners and operators of natural gas and hazardous liquids pipelines to consider the threat from ERW pipe manufactured prior to 1970. The operators were advised to determine whether their pipelines were susceptible to ERW seam failures and address the potential impact on pipeline integrity.

Determination of Necessity for Corrective Action Order and Right to Hearing:

Section 60112 of Title 49, United States Code, provides for the issuance of a CAO, after reasonable notice and the opportunity for a hearing, requiring corrective action, which may include the suspended or restricted use of a pipeline facility, physical inspection, testing, repair, replacement, or other action, as appropriate. The basis for making the determination that a pipeline facility is

² See <https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/technical-resources/pipeline/hazardous-liquid-integrity-management/64376/tto5lowfrequencyerwfinalreportrev3april2004.pdf> (last accessed September 14, 2020).

hazardous and requiring corrective action is set forth both in the above-referenced statute and 49 C.F.R. § 190.233.

Section 60112, and the regulations promulgated thereunder, provide for the issuance of a CAO without prior opportunity for notice and hearing upon a finding that failure to issue the Order expeditiously will likely result in serious harm to life, property or the environment. In such cases, an opportunity for a hearing will be provided as soon as practicable after the issuance of the Order.

After evaluating the foregoing preliminary findings of fact, I find that the continued operation of the Affected Segment, as defined below, without corrective measures is or would be hazardous to life, property and the environment. Given that this is a pre-1970 LF ERW pipe, there is an increased likelihood that there are other locations along the pipe that are subject to the same operational cycles and fatigue, heightening the risk of imminent failures along the pipe. Furthermore, given that the area of the rupture appears to be at a low point in the line which is located in a swamp, there is an increased possibility of the presence of moisture that may increase the likelihood of increased external corrosion. In fact, recent ILI data showed indications of increased corrosion in the vicinity of the rupture. Therefore, after considering the age of the pipe, the manufacturing method, the hazardous nature of the product being transported, the pressure required for transporting the material, the attributes of the ROW, the uncertainties as to the cause of the Incident, and the ongoing investigation of the Incident, I find that a failure to issue this Order expeditiously to require immediate corrective action would result in likely serious harm to life, property, and the environment.

Accordingly, this CAO mandating immediate corrective action is issued without prior notice and opportunity for a hearing. The terms and conditions of this Order are effective upon receipt.

Within 10 days of receipt of this Order, Respondent may request a hearing, to be held as soon as practicable, by notifying the Associate Administrator for Pipeline Safety in writing, with a copy to the Director, Southwest Region, PHMSA (Director). If a hearing is requested, it will be held in accordance with 49 C.F.R. § 190.211.

After receiving and analyzing additional data in the course of this investigation, PHMSA may identify other corrective measures that need to be taken. Respondent will be notified of any additional measures required and, if appropriate, PHMSA will consider amending this Order. To the extent consistent with safety, Respondent will be afforded notice and an opportunity for a hearing prior to the imposition of any additional corrective measures.

Required Corrective Actions:

Definitions:

Affected Segment – Means the entire 15.9 miles of the 12-inch Sanford Lateral operated by Florida Gas Transmission that transports natural gas from FGT's 26-inch mainline to the serve the Duke Power Plant and Sanford FPU meter station.

Isolated Segment – Means the portion of the Affected Segment between the weld cap location (approximately MP 14.5) and Valve 17-216B that remains out of service.

Pursuant to 49 U.S.C. 60112, I hereby order FGT to immediately take the following corrective actions for the Isolated and Affected Segments:

1. ***Shutdown of the Isolated Segment.*** The Isolated Segment is currently out of service and must remain shut down until its restart in accordance with this Order.
2. ***Operating Pressure Restriction of the Affected Segment.*** FGT must maintain a fifty percent (50%) pressure reduction in the actual operating pressure along the entire length of the Affected Segment such that the operating pressure along the Affected Segment will not exceed fifty percent (50%) of the actual operating pressure in effect immediately prior to the failure on September 10, 2020.
 - a. This pressure restriction is to remain in effect until written approval to increase the pressure or return the pipeline to its pre-failure operating pressure is obtained from the Director.
 - b. Within 14 calendar days of receipt of the Order, FGT must provide the Director the actual operating pressures of each compressor station and each main line pressure regulating station on the Affected Segment at the time of failure and the reduced pressure restriction set-points at these same locations.
 - c. This pressure restriction requires any relevant remote or local alarm limits, software programming set-points or control points, and mechanical over-pressure devices to be adjusted accordingly.
 - d. When determining the pressure restriction set-points, FGT must take into account any ILI features or anomalies present in the Affected Segment to provide for continued safe operation while further corrective actions are completed.
 - e. FGT must review the pressure restriction monthly by analyzing the operating pressure data. Take into account any ILI features or anomalies present in the Affected Segment and immediately reduce the operating pressure to maintain the safe operations of the Affected Segment, if warranted by the monthly review.
3. ***Restart Plan.*** Prior to resuming operation of the Isolated Segment, FGT must develop and submit a written Restart Plan to the Director for approval.
 - a. The Director may approve the Restart Plan incrementally without approving the entire plan but the Isolated Segment cannot resume operation until the Restart Plan is approved in its entirety.
 - b. Once approved by the Director, the Restart Plan will be incorporated by reference into this Order.
 - c. The Restart Plan must provide for adequate patrolling of the Isolated Segment during the restart process and must include incremental pressure increases during start up, with each increment to be held for at least two hours.

- d. The Restart Plan must include sufficient surveillance of the pipeline during each pressure increment to ensure that no leaks are present when operation of the line resumes.
 - e. The Restart Plan must specify a day-light restart and include advance communications with local emergency response officials.
 - f. The Restart Plan must provide for a review of the Isolated Segment for conditions similar to those of the failure including a review of construction, operating and maintenance and integrity management records such as ILI results, hydrostatic pressure tests, root cause failure analysis of prior failures, aerial and ground patrols, corrosion, cathodic protection, excavations and pipe replacements. FGT must address any findings that require remedial measures to be implemented prior to restart.
 - g. The Restart Plan must also include documentation of the completion of all mandated actions, and a management of change plan to ensure that all procedural modifications are incorporated into FGT's operations and maintenance procedures manual.
 - h. The Restart Plan must provide for hydrostatic pressure testing of the Isolated Segment.
 - i. Prior to restart, submit to the Director a contingency plan to operate and monitor the Isolated Segment during flooding conditions, including enhanced patrolling and surveillance.
4. ***Return to Service.*** After the Director approves the Restart Plan, FGT may return the Isolated Segment to service but the operating pressure must not exceed fifty percent (50%) of the actual operating pressure in effect immediately prior to the failure on September 10, 2020, in accordance with Item 2 above.
5. ***Removal of Pressure Restriction.*** The Director may allow the removal or modification of the pressure restriction upon a written request from FGT demonstrating that restoring the pipeline to its pre-failure operating pressure is justified based on a reliable engineering analysis showing that the pressure increase is safe considering all known defects, anomalies, and operating parameters of the pipeline.
- a. The Director may allow the temporary removal or modification of the pressure restrictions upon a written request from FGT demonstrating that temporary mitigative and preventive measures are implemented prior to and during the temporary removal or modification of the pressure restriction. The Director's determination will be based on the known or suspected failure cause and provision of evidence that preventative and mitigative actions taken by the operator provide for the safe operation of the Affected Segment during the temporary removal or modification of the pressure restriction. Appeals to determinations of the Director in this regard will be decided by the Associate Administrator for Pipeline Safety.

6. ***Instrumented Leakage Survey.*** Within 30 calendar days of receipt of this Order, FGT must perform an aerial or ground instrumented leakage survey of the Affected Segment. FGT must investigate all leak indications and remedy all leaks discovered. FGT must submit documentation of this survey to the Director within 45 days of receipt of this Order.
7. ***Records Verification.*** As recommended in PHMSA Advisory Bulletin 2012-06, verify the records for the Affected Segment to confirm the maximum allowable operating pressure. FGT must submit documentation of this this record verification to the Director within 45 days of receipt of this Order.
8. ***Review of Prior Inline Inspection Results.*** Within 30 days of receipt of this Order, FGT must conduct a review of any previous ILI results of the Affected Segment to re-evaluate all ILI results from the past five calendar years, include a review of the ILI vendors' raw data and analysis, and determine whether any features were present in the failed pipe joint and any other pipe removed. Also, determine if any features with similar characteristics are present elsewhere on the Affected Segment. FGT must submit documentation of this ILI review to the Director within 45 days of receipt of this Order as follows:
 - a. List all ILI tool runs, tool types, and the calendar years of the tool runs.
 - b. List, describe (type, size, wall loss, etc.), and identify the specific location of all ILI features present in the failed joint and/or other pipe removed.
 - c. List, describe (type, size, wall loss, etc.), and identify the specific location of all ILI features with similar characteristics present elsewhere on the Affected Segment.
 - d. Explain the process used to review the ILI results and the results of the reevaluation.
9. ***Mechanical and Metallurgical Testing.*** Within 45 days of receipt of this Order, submit for approval a plan for mechanical and metallurgical testing and failure analysis of the failed pipe, including an analysis of soil samples and any foreign materials, by an approved independent third-party laboratory. Complete the testing and analysis as follows:
 - a. Document the chain-of-custody when handling and transporting the failed pipe section and other evidence from the failure site.
 - b. Within 10 days of receipt of this Order, develop and submit the testing protocol and the proposed testing laboratory to the Director for prior approval.
 - c. Prior to beginning the mechanical and metallurgical testing, provide the Director with the scheduled date, time, and location of the testing to allow for an OPS representative to witness the testing.
 - d. Ensure the testing laboratory distributes all reports whether draft or final in their entirety to the Director at the same time they are made available to FGT.
10. ***Root Cause Failure Analysis.*** Within 90 days following receipt of this Order, complete a root cause failure analysis (RCFA) and submit a final report of this RCFA to the Director. The RCFA must be supplemented or facilitated by an independent third-party acceptable to the Director and must document the decision-making process and all factors

contributing to the failure. The final report must include findings and any lessons learned and whether the findings and any lessons learned are applicable to other locations within FGT's pipeline system.

11. ***Remedial Work Plan.***

- a. Within 90 days following receipt of this Order, FGT must submit a Remedial Work Plan (RWP) to the Director for approval. The Director may approve the RWP incrementally without approving the entire RWP.
- b. Once approved by the Director, the RWP will be incorporated by reference into this Order, and FGT must implement the RWP as it is approved by the Director, including any revisions to the plan.
- c. The RWP must specify the tests, inspections, assessments, evaluations, and remedial measures FGT will use to verify the integrity of the Affected Segment. It must address all known or suspected factors and causes of the September 10, 2020 failure. FGT should consider both the risk of another failure and the consequence of another failure to develop a prioritized schedule for RWP related work along the Affected Segment.
- d. The RWP must include a procedure or process to:
 - i. Identify pipe in the Affected Segment and other pipelines in the FGT operating areas with characteristics similar to the contributing factors identified for the September 10, 2020 failure.
 - ii. Gather all data necessary to review the failure history (in service and pressure test failures) of the Affected Segment and to prepare a written report containing all the available information such as the locations, dates, and causes of leaks and failures.
 - iii. Integrate the results of the metallurgical testing, root cause failure analysis, and other corrective actions required by this Order with all relevant pre-existing operational and assessment data for the Affected Segment. Pre-existing operational data includes, but is not limited to, manufacturing and construction, operations, maintenance, testing, repairs, prior metallurgical analyses, and any third-party consultation information. Pre-existing assessment data includes, but is not limited to, ILI tool runs, hydrostatic pressure testing, direct assessments, close interval surveys, and DCVG/ACVG surveys.
 - iv. Determine if conditions similar to those contributing to the failure on September 10, 2020 are likely to exist elsewhere on FGT's operational pipelines.
 - v. Conduct additional field tests, inspections, assessments, and/or evaluations necessary to determine whether, and to what extent, the conditions associated with the failure on September 10, 2020, and other failures from

the failure history in Item 11(d)(ii) above or any other integrity threats are present elsewhere on the Affected Segment or other systems operated by FGT. At a minimum, this process must consider all failure causes and specify the use of one or more of the following:

1. ILI tools that are technically appropriate for assessing the pipeline system based on the cause of failure on September 10, 2020, and that can reliably detect and identify anomalies;
2. Hydrostatic pressure testing;
3. Close-interval surveys;
4. Cathodic protection surveys, to include interference surveys in coordination with other utilities (e.g. underground utilities, overhead power lines, etc.) in the area;
5. Coating surveys;
6. Stress corrosion cracking surveys;
7. Selective seam corrosion surveys; and
8. Other tests, inspections, assessments, and evaluations appropriate for the failure causes.

FGT may use the results of previous tests, inspections, assessments, and evaluations if approved by the Director, provided the results of the tests, inspections, assessments, and evaluations are analyzed with regard to the factors known or suspected to have caused the September 10, 2020 failure.

- vi. Describe the inspection and repair criteria FGT will use to prioritize, excavate, evaluate, and repair anomalies, imperfections, and other identified integrity threats. Include a description of how any defects will be graded and a schedule for repairs or replacement.
 - vii. Based on the known history and condition of the Affected Segment, describe the methods FGT will use to repair, replace, or take other corrective measures to remediate the conditions associated with the pipeline failure on September 10, 2020, and to address other known integrity threats along the Affected Segment. The repair, replacement, or other corrective measures must meet the criteria specified in Item 11(d)(vi) above.
 - viii. Implement continuing long-term periodic testing and integrity verification measures to ensure the ongoing safe operation of the Affected Segment considering the results of the analyses, inspections, evaluations, and corrective measures undertaken pursuant to the Order.
- e. The RWP must include a schedule for completion.

- f. FGT must revise the RWP as necessary to incorporate new information obtained during the failure investigation and remedial activities, to incorporate the results of actions undertaken pursuant to this Order, and to incorporate any modifications required by the Director.
 - i. Submit any plan revisions to the Director for prior approval.
 - ii. The Director may approve plan revisions incrementally.
 - iii. Any and all revisions to the RWP after it has been approved and incorporated by reference into this Order will be fully described and documented in the CAO Documentation Report (CDR).
12. **CAO Documentation Report.** When FGT has concluded all the items in this Order it will submit the final CDR in its entirety to the Director. This will allow the Director to complete a thorough review of all actions taken by FGT with regards to this Order prior to approving the closure of this Order. The intent is for the CDR to summarize all activities and documentation associated with this Order in one document.
- a. The Director may approve the CDR incrementally without approving the entire CDR.
 - b. Once approved by the Director, the CDR will be incorporated by reference into this Order.
 - c. The CDR must include, but is not necessarily limited to, the following elements:
 - i. Table of Contents;
 - ii. Summary of the pipeline failure of September 10, 2020, and the response activities;
 - iii. Summary of pipe data/properties and all prior assessments of the Affected Segment;
 - iv. Summary of all tests, inspections, assessments, evaluations, and analysis required by the Order;
 - v. Summary of the Mechanical and Metallurgical Testing as required by the Order;
 - vi. Summary of the RCFA with all root causes as required by the Order;
 - vii. Documentation of all actions taken by FGT to implement the RWP, the results of those actions, and the inspection and repair criteria used;
 - viii. Documentation of any revisions to the RWP including those necessary to incorporate the results of actions undertaken pursuant to this Order and whenever necessary to incorporate new information obtained during the failure investigation and remedial activities;

- ix. Lessons learned while completing this Order;
- x. A path forward describing specific actions FGT will take on its entire pipeline system as a result of the lessons learned from work on this Order; and
- xi. Other Appendices as required.

Other Requirements:

13. **Approvals.** With respect to each submission that under this Order requires the approval of the Director, the Director may: (a) approve, in whole or part, the submission; (b) approve the submission on specified conditions; (c) modify the submission to cure any deficiencies; (d) disapprove in whole or in part, the submission, directing that Respondent modify the submission, or (e) any combination of the above. In the event of approval, approval upon conditions, or modification by the Director, Respondent shall proceed to take all action required by the submission as approved or modified by the Director. If the Director disapproves all or any portion of the submission, Respondent must correct all deficiencies within the time specified by the Director, and resubmit it for approval.
14. **Extensions of Time.** The Director may grant an extension of time for compliance with any of the terms of this Order upon a written request timely submitted demonstrating good cause for an extension.
15. **Reporting.** Submit quarterly reports to the Director that: (1) include all available data and results of the testing and evaluations required by this Order; and (2) describe the progress of the repairs or other remedial actions being undertaken. The first quarterly report is due on December 31, 2020. The Director may change the interval for the submission of these reports.
16. **Documentation of the Costs.** It is requested but not required that Respondent maintain documentation of the costs associated with implementation of this Corrective Action Order. Include in each monthly report submitted, the to-date total costs associated with: (1) preparation and revision of procedures, studies and analyses; (2) physical changes to pipeline infrastructure, including repairs, replacements and other modifications; and (3) environmental remediation, if applicable.

Be advised that all material you submit in response to this enforcement action is subject to being 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).

In your correspondence on this matter, please refer to “CPF No. 4-2020-008-CAO” and for each document you submit, please provide a copy in electronic format whenever possible. The actions required by this Order are in addition to and do not waive any requirements that apply to

Respondent's pipeline system under 49 C.F.R. Parts 190 through 199, under any other order issued to Respondent under authority of 49 U.S.C. Chapter 601, or under any other provision of Federal or State law.

Respondent may appeal any decision of the Director to the Associate Administrator for Pipeline Safety. Decisions of the Associate Administrator shall be final.

Failure to comply with this Order may result in the assessment of civil penalties and in referral to the Attorney General for appropriate relief in United States District Court pursuant to 49 U.S.C. § 60120.

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 MAYBERRY
Date: 2020.09.18 14:32:22
-04'00'

September 18, 2020

Alan K. Mayberry
Associate Administrator
for Pipeline Safety

Date Issued