



**By Electronic Mail**

October 30, 2020

Mr. Alan K. Mayberry  
Associate Administrator for Pipeline Safety  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
1200 New Jersey Avenue, S.E.  
Washington, DC 20590

**Re: Florida Gas Transmission Company  
Amended Corrective Action Order, CPF 1-2020-008-CAO  
Withdrawal of Request for Hearing**

Dear Mr. Mayberry:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) issued the above referenced Amended Corrective Action Order (ACAO) to Florida Gas Transmission Company (FGT or the Company) on October 1, 2020. FGT is an Energy Transfer (ET) affiliate company. PHMSA first issued a CAO to FGT on September 18, 2020 in conjunction with an incident that occurred on September 10, 2020 on its 12-inch Sanford Lateral located in Sanford, Florida (Incident 1). PHMSA then issued the above referenced ACAO to FGT, in response to a September 24, 2020 incident that occurred on its 18-inch FLMEA-21 line located in Lake Worth, Florida (Incident 2), which supersedes the CAO. FGT timely filed a Request for Hearing on the terms of the ACAO on October 13, 2020, pursuant to 49 C.F.R. §§ 190.208 and 190.211.

FGT simultaneously requested the opportunity to engage further with the PHMSA Southwest Region to determine whether the issues in dispute could be narrowed or resolved. Following subsequent discussions on the above referenced ACAO, PHMSA issued a Second ACAO on October 22, 2020, to incorporate agreed upon revisions. FGT has met with the Southwest Region to review and discuss the terms of the Second ACAO as well. Based on those discussions, the parties have reached agreement as to the definition of “Incident 2 Affected Pipeline” means “approximately 124.6 miles of pre-1970 LF ERW pipe contained in the 18-inch FLMEA pipeline system.” The discussions regarding the second ACAO are ongoing.

FGT appreciates PHMSA’s willingness to engage in productive discussions to resolve the issues presented by the ACAO and the Second ACAO. Based on the agreements reached during discussions thus far, and without admission or denial of any of the factual or legal allegations set forth in the ACAO or Second ACAO or waiving any rights available to FGT, the Company withdraws its Request for Hearing regarding the above referenced ACAO.

FGT will continue to work collaboratively with the PHMSA Southwest Region. If you have any questions, please do not hesitate to contact me. Thank you for your continued cooperation in response to these incidents.

Sincerely,

Todd Nardozzi

Director – Regulatory Compliance  
Energy Transfer

cc: Ms. Linda Daugherty, Deputy Associate Administrator for Field Operations, PHMSA  
Ms. Mary McDaniel, Director, Southwest Region, PHMSA  
Mr. Eric Amundsen, SVP Operations, ET  
Mr. David Shellhouse, VP Operations, FGT/ET  
Mr. Mark Milliken, VP Technical Services, ET  
Ms. Catherine Little, Troutman Pepper, LLP