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

1200 New Jersey Avenue, SE
Washington, DC 20590

September 24, 2025

VIA ELECTRONIC MAIL TO: steven_romano@kindermorgan.com

Steven Romano
Chief Operating Officer
Colorado Interstate Gas Company, L.L.C.
1001 Louisiana St.
Suite 1000
Houston, TX 77002

CPF No. 2-2025-005-CAO

Dear Mr. Romano:

Enclosed please find a Corrective Action Order (CAO or Order) issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS). It requires Colorado Interstate Gas Company, L.L.C., a subsidiary of Kinder Morgan, Inc., to take certain corrective actions with respect to a pipeline failure that occurred on September 21, 2025, on the 22-inch interstate natural gas transmission line near Cheyenne, Wyoming.

Service of the CAO by electronic mail is effective upon the date of transmission and acknowledgement of receipt as provided under 49 CFR § 190.5. The terms and conditions of this Order are effective upon completion of service.

Sincerely,

LINDA GAIL DAUGHERTY
Digitally signed by LINDA GAIL DAUGHERTY
Date: 2025.09.24 16:59:34 -04'00'

Linda G. Daugherty
Acting Associate Administrator
for Pipeline Safety

Enclosure: CAO

cc: Mr. Zachary Ragain – Director – Codes and Standards,
Zach_Ragain@kindermorgan.com
Mr. James Urisko, Director, Southern Region, Office of Pipeline Safety, PHMSA,
james.urisko@dot.gov

CONFIRMATION OF 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	)	
Colorado Interstate Gas Co., L.L.C., a subsidiary of Kinder Morgan, Inc.	)	**CPF No. 2-2025-005-CAO**
Respondent.	)	

CORRECTIVE ACTION ORDER

Purpose and Background

This Corrective Action Order (CAO or Order) is being issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), under the authority of 49 U.S.C. § 60112, to require Colorado Interstate Gas Company, L.L.C. (CIG or Respondent), a subsidiary of Kinder Morgan, Inc.,[1] to take certain necessary corrective actions to protect the public, property, and the environment from potential hazards associated with the September 21, 2025 natural gas pipeline failure that occurred on the 22-inch Colorado Interstate Line 05A pipeline at mile post 103+2918 (approximately 1,930 feet west of main line valve 10) near Cheyenne, Wyoming (hereinafter the Incident).

Colorado Interstate is a 4,350-mile pipeline system that transports natural gas from production areas in the Rocky Mountains directly to customers in Colorado and the Pacific Northwest. On September 21, 2025, at approximately 01:40 AM Eastern Daylight Time (EDT) Colorado Interstate's Line 05A pipeline failed.[2] The failure resulted in a rupture and fire.

Railroad tracks are in proximity to the pipeline right-of-way and failure location. Prior to the failure, the crew of a Union Pacific Railroad MNPWC-20 freight train visually observed a dust and vapor cloud. Following this observation, they brought the train to a safe stop. After the train stopped, the Incident occurred. The rupture caused a 50-foot crater to form next to the railroad siding. The main track and siding are significantly comprised. Two train storage cars carrying ethanol initially derailed where the track was compromised. The storage cars melted in the

[1] Colorado Interstate Gas Company, L.L.C., KINDER MORGAN, https://pipeportal.kindermorgan.com/portalui/DefaultKM.aspx?TSP=CIGD (last visited September 23, 2025).

[2] September 21, 2025, at 01:40 AM was the approximate time of the failure in Eastern Daylight Time. It occurred September 20, 2025, at 11:40 PM local time (Mountain Daylight Time).

railway siding and collapsed in on themselves. A third railcar with unknown contents eventually derailed as well. Union Pacific Railroad reported NRC #1443295 for fire on a freight train.

In response, CIG shutdown a segment of Line 05A between main line valve 8.7 and main line valve 11. It remains shutdown. CIG reported the Incident to the NRC on September 21, 2025, at 04:29 AM Eastern Daylight Time.[3] An estimated 500,000 MCF of natural gas was released. The damage amount is currently unknown. No injuries or fatalities have been reported.

Pursuant to 49 U.S.C. § 60117, PHMSA initiated an investigation of the Incident. The preliminary findings of the Agency's ongoing investigation are as follows:

Preliminary Findings

- Colorado Interstate is a 4,350-mile pipeline system that transports natural gas from production areas in the Rocky Mountains directly to customers in Colorado and the Pacific Northwest.

- At approximately 01:40 AM Eastern Daylight Time on September 21, 2025, a Colorado Interstate's 22-inch Line 05A natural gas pipeline failed at mile post 103+2918 (approximately 1,930 feet west of main line valve 10), near Cheyenne Wyoming. The town closest to the location of the Incident is Granite, Wyoming.

- Line 05A was installed January 4, 1956. The pipeline wall thickness is 0.375 inches with coal tar coating. The pipeline steel grade is reported as API 5L - X46,000. AO Smith manufactured the pipeline with an electric resistance weld. The system is cathodically protected.

- The pipeline maximum allowable operating pressure (MAOP) is 850 psig.

- Line 05A shares a common right-of-way with five parallel natural gas transmission pipelines and one highly volatile liquid transmission pipeline: All five pipelines run parallel to the adjacent railroad tracks. Three other operators share the right-of-way with Colorado Interstate.

- Railroad tracks are in proximity to the pipeline right-of-way and failure location. Prior to the failure, the crew of a Union Pacific Railroad MNPWC-20 freight train visually observed a dust and vapor cloud. Following this observation, they brought the train to a safe stop. After the train stopped, the Incident occurred.

- The rupture caused a 50-foot crater to form next to the railroad siding. The main track and siding are significantly comprised. Two train storage cars carrying ethanol initially derailed where the track was compromised. The storage cars melted in the railway siding and collapsed in on themselves. A third railcar with unknown contents eventually

[3] NRC Report # 1443296 (original) and 1443457 (48-hour update).

derailed as well. Union Pacific Railroad reported NRC #1443295 for fire on a freight train.

- An estimated 500,000 MCF of natural gas was released. The damage amount is currently unknown. No injuries or fatalities have been reported.

- CIG shutdown the segment of Line 05A between main line valve 8.7 at Cheyenne Compressor Station and main line valve 11 located east of Buford Road and south of I-80. It remains shutdown.

- The cause of the Incident is currently unknown. PHMSA is continuing its investigation. The National Transportation Safety Board has also initiated an investigation.

- Pre-1970 low-frequency electric resistance weld (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. 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.

- The Battelle Memorial Institute issued a report on the integrity characteristics of vintage pipelines in 2005. The Battelle study stated that hard spots develop during hot rolling of a steel plate when an uncontrolled jet of water locally cools a portion of the plate too quickly. The water quenched areas form untampered martensite, with hardness levels locally much higher than the remainder of the pipe. If the coating does not have good adhesion or has been damaged, it can be exposed to hydrogen. If cathodic protection (CP) levels are above or below certain voltage levels, hydrogen can be generated. Typically, this occurs in pipelines that operate at higher stress levels.

- ERW pipe manufactured prior to 1970 has a history of increased risk of seam failures. PHMSA issued two advisory bulletins (ALN-88-01 on January 28, 1988, and ALN-89-01 on March 8, 1989) regarding factors contributing to operational failures of pipelines constructed with ERW pipe manufactured prior to 1970. PHMSA identified selective corrosion of the ERW seam as a contributing cause of failure in a significant number of these accidents. Other failures have occurred due to the growth of manufacturing defects in ERW seams. The advisory bulletins recommended that operators reevaluate the potential for safety problems on their high-pressure pre-1970 ERW pipelines by hydrostatic testing on those pipelines, ensuring the effectiveness of cathodic protection systems, and taking additional safety measures.

- PHMSA's safety regulations require an operator to identify potential threats to pipeline integrity and use the identified threats in its pipeline safety integrity program.[4] ERW pipe

[4] 49 CFR § 192.917.

and defects from manufacturing and construction are specific threats identified by PHMSA's regulations and PHMSA's regulations require an operator to take specific actions to address them.[5]

Determination of Necessity for Corrective Action Order and Right to Hearing

Section 60112 of title 49, United States Code, authorizes PHMSA to determine that a pipeline facility is or would be hazardous to life, property, or the environment and if there is a likelihood of serious harm, to expeditiously order the operator of the facility to take necessary corrective action, including suspended or restricted use of the facility, physical inspection, testing, repair, replacement, or other appropriate action. An order issued expeditiously must provide an opportunity for a hearing as soon as practicable after the order is issued.

In deciding whether to issue an order, PHMSA must consider the following, if relevant: (1) the characteristics of the pipe and other equipment used in the pipeline facility, including the age, manufacture, physical properties, and method of manufacturing, constructing, or assembling the equipment; (2) the nature of the material the pipeline facility transports, the corrosive and deteriorative qualities of the material, the sequence in which the material is transported, and the pressure required for transporting the material; (3) the aspects of the area in which the pipeline facility is located, including climatic and geologic conditions and soil characteristics; (4) the proximity of the area in which the hazardous liquid pipeline facility is located to environmentally sensitive areas; (5) the population density and population and growth patterns of the area in which the pipeline facility is located; (6) any recommendation of the National Transportation Safety Board made under another law; and (7) any other factors PHMSA may consider as appropriate.

After evaluating the foregoing preliminary findings of fact, and having considered the characteristics of the pipeline, including the hazardous nature of the material (natural gas) transported and the known threat to pipeline integrity from ERW pipe and manufacturing and construction defects; the uncertainty as to the root cause of the Incident; the impacts and potentially unknown impacts to nearby property, multiple pipelines and modes of transportation, and the environment; the risk of additional, related incidents; and the possibility that the same condition(s) that may have caused the failure remain present in the pipeline; I find that continued operation of the *Affected Pipeline*, as defined below, without corrective measures is or would be hazardous to life, property, or the environment, and that failure to issue this Order expeditiously would result in the likelihood of serious harm.

Accordingly, this Order mandating immediate corrective action is issued expeditiously 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 Acting Associate Administrator for Pipeline Safety in writing, with a copy to the Director, Southern Region, PHMSA. If a hearing is requested, it will be held in accordance with 49 CFR § 190.211.

[5] 49 CFR § 192.917(e)(3) & (e)(4).

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 Pipeline – The *"Affected Pipeline"* means the approximately 68-mile segment of CIG's Line 05A pipeline between CIG's Cheyenne and Laramie Compressor Stations.

Isolated Segment – The "*Isolated Segment*" means the segment of CIG's Line 05A pipeline between main line valve 8.7 at Cheyenne Compressor Station and main line valve 11 located east of Buford Road and south of I-80.

Director – The "*Director*" means the Director, PHMSA, OPS Southern Region.

Pursuant to 49 U.S.C. 60112, I hereby order CIG to take the following corrective actions:

1. ***Shutdown of the Isolated Segment.*** CIG must not operate the *Isolated Segment* until authorized to do so in writing by the Director.

2. ***Operating Pressure Restriction.*** CIG must reduce and maintain a twenty percent (20%) pressure reduction in the actual operating pressure along the entire length of the *Affected Pipeline* such that upon restart the operating pressure along the *Affected Pipeline* will not exceed eighty percent (80%) of the actual operating pressure in effect at the failure location, immediately prior to the failure on September 21, 2025.

    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 15 days of receipt of the CAO, CIG must provide the Director the actual operating pressures of each compressor station and each main line pressure regulating station on the *Affected Pipeline* at the time of failure and the reduced pressure restriction set-points at these same locations. This includes the Cheyenne and Laramie Compressor Stations bounding the *Affected Pipeline*.

    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, CIG must take into account any in-line inspection (ILI) features or anomalies present in the *Affected Pipeline* to provide for continued safe operation while further corrective actions are completed.

e. CIG must review the pressure restriction monthly by analyzing the operating pressure data, taking into account any ILI features or anomalies present in the *Affected Pipeline.* CIG must immediately reduce the operating pressure further to maintain the safe operations of the *Affected Pipeline*, if warranted by the monthly review. Further, CIG must submit the results of the monthly review to the Director including, at a minimum, the current discharge set-points (including any additional pressure reductions), and any pressure exceedance at discharge set-points. Submittals may be made quarterly, in accordance with Item 14 below.

3. ***Instrumented Leakage Survey***. Within 30 days of receipt of the CAO, CIG must perform an aerial or ground instrumented leakage survey of the *Affected Pipeline.* CIG must investigate all leak indications and remedy all leaks discovered. CIG must submit documentation of this survey to the Director within 45 days of receipt of the CAO.

4. ***Review of Prior Inline Inspection (ILI) Results.***

   a. Within 30 days of receipt of the CAO, CIG must conduct a review of any previous ILI results of the *Affected Pipeline*. In its review, CIG must re-evaluate all ILI results from the past 10 calendar years, including a review of the ILI vendors' raw data and analysis. CIG must determine whether any features were present in the failed pipe joints from the September 21, 2025 failure. Also, CIG must determine if any features with similar characteristics are present elsewhere on the *Affected Pipeline*. CIG must submit documentation of this ILI review to the Director within 45 days of receipt of the CAO, as follows:

      i. List all ILI tool runs, tool types, and the calendar years of the tool runs.

      ii. List, describe (type, size, wall loss, etc.), and identify the specific location of all ILI features present in the failed joint and other pipe removed.

      iii. List, describe (type, size, wall loss, etc.), and identify the specific location of all ILI features with similar characteristics present elsewhere on the *Affected Pipeline*.

      iv. Explain the process used to review the ILI results and the results of the reevaluation.

5. ***Mechanical and Metallurgical Testing***. Mechanical and metallurgical testing, including failure analysis, will be performed by the NTSB in accordance with NTSB procedures and protocols. In the event the NTSB does not perform these functions, within 45 days of receipt of the CAO, CIG must complete mechanical and metallurgical testing and failure analysis of the failed pipe, including an analysis of soil samples and any foreign materials. Mechanical and metallurgical testing must be conducted by an independent third-party acceptable to the Director, and must document the decision-making process and all factors contributing to the failure. CIG must 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 the CAO, 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 CIG.

6. ***Root Cause Failure Analysis.*** Within 90 days following receipt of the CAO, 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 approved in writing by 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 lessons learned are applicable to other locations within CIG's pipeline system. Should the NTSB perform the RCFA as part of its investigation, CIG must incorporate the results of that analysis into its integrity management plan and operations and maintenance manual.

7. ***Remedial Work Plan (RWP).***

a. Within 90 days following receipt of the CAO, CIG must submit a remedial work plan (RWP) to the Director for approval.

b. The Director may approve the RWP incrementally without approving the entire RWP.

c. Once approved by the Director, the RWP will be incorporated by reference into this Order.

d. The RWP must specify the tests, inspections, assessments, evaluations, and remedial measures CIG will use to verify the integrity of the *Affected Pipeline*. It must address all known or suspected factors and causes of the September 21, 2025 failure. CIG must consider the risks and consequences of another failure to develop a prioritized schedule for RWP-related work along the *Affected Pipeline.*

e. The RWP must include a procedure or process to:

i. Identify pipe in the *Affected Pipeline* with characteristics similar to the contributing factors identified for the September 21, 2025 failure, including the age and manufacture of the entire length of the *Affected Pipeline*.

ii. Gather all data necessary to review the failure history (in service and pressure test failures) of the *Affected Pipeline* 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 Pipeline.* Pre-existing operational data includes, but is not limited to, design, 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 21, 2025, are likely to exist elsewhere on the *Affected Pipeline.*

v. Conduct additional field tests, inspections, assessments, and evaluations to determine whether, and to what extent, the conditions associated with the failure on September 21, 2025, and other failures from the failure history (see (e)(ii) above) or any other integrity threats are present elsewhere on the *Affected Pipeline*. 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 21, 2025, 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.

Note: CIG 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 21, 2025 failure.

vi. Describe the inspection and repair criteria CIG 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 Pipeline,* describe the methods CIG will use to repair, replace, or take other corrective measures to remediate the conditions associated with the pipeline failure on September 21, 2025, and to address other known integrity threats along the *Affected Pipeline*. The repair, replacement, or other corrective measures must meet the criteria specified in (e)(vi) above.

viii. Implement continuing long-term periodic testing and integrity verification measures to ensure the ongoing safe operation of the *Affected Pipeline* considering the results of the analyses, inspections, evaluations, and corrective measures undertaken pursuant to the Order.

f. Include a proposed schedule for completion of the RWP.

g. CIG 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 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. 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*.

h. Implement the RWP as it is approved by the Director, including any revisions to the plan.

8. ***CAO Documentation Report (CDR***). CIG must create and revise, as necessary, a CAO Documentation Report (CDR). When CIG 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 CIG 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:

i. Table of Contents;

ii. Summary of the pipeline failure of September 21, 2025, and the response activities;

iii. Summary of pipe data, material properties and all prior assessments of the *Affected Pipeline*;

iv. Summary of all tests, inspections, assessments, evaluations, and analysis required bythe 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 CIG 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 CIG will take on its entire pipeline systemas a result of the lessons learned from work on this Order; and

xi. Appendices (if required).

9. ***Restart Plan.*** Prior to resuming operation of the *Isolated Segment,* develop and submit a written *Restart Plan* to the Director for prior 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 2 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 and adjacent landowners.

   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 (O&M) and integrity management records such as ILI results, hydrostatic tests, root cause failure analysis of prior failures, aerial and ground patrols, corrosion, cathodic protection, excavations and pipe replacements. CIG 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 CIG's O&M procedures manual.

10. ***Return to Service.*** After the Director approves the *Restart Plan*, CIG may resume operation of the *Isolated Segment* according to the terms of the *Restart Plan*, but the operating pressure must not exceed the limit in accordance with Item 2 above.

11. ***Removal of Pressure Restriction***.

   a. The Director may allow the removal or modification of the pressure restriction upon a written request from CIG 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.

b. The Director may allow the temporary removal or modification of the pressure restrictions upon a written request from CIG 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 available information, including the failure cause and provision of evidence that preventative and mitigative actions taken by the operator provide for the safe operation of the *Affected Pipeline* during the temporary removal or modification of the pressure restriction. Appeals to determinations of the Director in this regard will be decided by the Acting Associate Administrator for Pipeline Safety.

Other Requirements:

12. ***Approvals.*** With respect to each submission under this Order that 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.

13. ***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.

14. ***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 January 15, 2026. The Director may change the interval for the submission of these reports.

15. ***Documentation of the Costs.*** It is requested that Respondent maintain documentation of the costs associated with implementation of this CAO. 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 forconfidential 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 confidentialtreatment 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. 2-2025-005-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 CFR 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 Acting Associate Administrator for Pipeline Safety. Decisions of the Acting 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 CFR § 190.5.

LINDA GAIL DAUGHERTY

Digitally signed by LINDA GAIL DAUGHERTY
Date: 2025.09.24 17:00:25 -04'00'

Linda G. Daugherty
Acting Associate Administrator
for Pipeline Safety

Date Issued