



Via Electronic Mail

April 12, 2021

Greg Ochs, Director
Central Region
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
901 Locust Street, Suite 462
Kansas City, MO 64106

Re: CPF 3-2021-5003M
Notice of Amendment

Dear Mr. Ochs:

DAPL-ETCO Operations Management, LLC (DAPL-ETCO or Company) is submitting the attached procedures in response to a Notice of Amendment (NOA) issued on January 26, 2021 (revised letter received January 28, 2021), by the Pipeline and Hazardous Materials Safety Administration (PHMSA). DAPL-ETCO is a subsidiary of Energy Transfer (ET). PHMSA's NOA identified three (3) alleged inadequacies within ET's Hazardous Liquid Standard Operating Procedures (SOPs).

By way of background, this NOA was issued following an inspection of the ET Hazardous Liquid procedures for operations & maintenance in Houston, Texas on April 29, 2019 to August 30, 2019. The apparent inadequacies described in the NOA concern requirements for procedural manuals for operations, maintenance and emergencies found in 195.402 and specifically those requirements that apply to computation of estimated costs for accident reporting, valve identification and abnormal operations.

Attached hereto are the updated applicable ET Hazardous Liquid procedures that address the alleged inadequacies.

NOA Item 1 - See Appendix E of Energy Transfer SOP HLA.15 PHMSA – States Accident Reporting which provides detailed instructions regarding the computation of costs associated emergency response as it relates to completion of PHMSA Form F 7000-1.

NOA Item 2 - See Energy Transfer SOP HLM.01 PHMSA Valve Inspection, Maintenance and Operation which has been updated to include additional detail regarding definitions and delineation between mainline valves and valves necessary for the safe operation of the pipeline system.

NOA Item 3 – See Energy Transfer SOP HLA.13 Recognizing and Responding to Abnormal Operations and HLCRM.09 Recognizing and Reacting to Abnormal Operations. Both procedures have been updated to clarify roles and responsibilities, cross reference processes between the two procedures and documentation requirements in response to abnormal operations.

Please note that this submission contains confidential business information and confidential security information that is protected from public disclosure under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. Should PHMSA receive a FOIA request for this information, the Agency is required to notify ET and provide the Company with an adequate opportunity to substantiate its claim, prepare redactions, and/or object, if warranted.

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ET shares PHMSA's commitment to pipeline safety, public safety, and pipeline integrity. Should you have any questions or concerns please contact me at (713) 989-7126 or via email at todd.nardozzi@energytransfer.com.

Sincerely,

Todd Nardozzi
Sr. Manager – DOT Compliance

cc: Greg McIlwain, SVP – Operations
Todd Stamm, VP - Operations
Mark Milliken, VP – Technical Services