



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

1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

April 30, 2026

**VIA ELECTRONIC MAIL TO: rcasadaban@blackbearllc.com**

Rene Casadaban  
Chief Executive Officer  
Black Bear Transmission, LLC  
1501 McKinney, Suite 800  
Houston, TX 77010

**Re: CPF No. 3-2025-024-NOPV**

Dear Mr. Casadaban:

Enclosed please find the Final Order issued in the above-referenced case. It withdraws one of the allegations of violation, makes a finding of violation and specifies actions that need to be taken by Black Bear Transmission, LLC to comply with the pipeline safety regulations. When the terms of the compliance order have been completed, as determined by the Director, Central Region, this enforcement action will be closed. Service of the Final Order by e-mail is effective upon the date of transmission and acknowledgement of receipt as provided under 49 CFR § 190.5.

Thank you for your cooperation in this matter.

Sincerely,  
**LINDA GAIL  
DAUGHERTY**  
Linda Daugherty  
Acting Associate Administrator  
for Pipeline Safety

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GAIL DAUGHERTY  
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Enclosure

cc: A.J. McKean, Director, Central Region, Office of Pipeline Safety, PHMSA  
Larry Bonner, VP of Operations, Black Bear Transmission, LLC,  
lbonner@blackbearllc.com  
Todd Cash, VP, Compliance & Sustainability, Enstor Gas,  
todd.cash@enstorinc.com

**CONFIRMATION OF RECEIPT REQUESTED**

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

|                                        |   |                                |
|----------------------------------------|---|--------------------------------|
|                                        | ) |                                |
| <b>In the Matter of</b>                | ) |                                |
|                                        | ) |                                |
| <b>Black Bear Transmission, LLC, a</b> | ) | <b>CPF No. 3-2025-024-NOPV</b> |
| <b>a subsidiary of Enstor Pipeline</b> | ) |                                |
| <b>Holdings, LLC,</b>                  | ) |                                |
|                                        | ) |                                |
| <b>Respondent.</b>                     | ) |                                |
|                                        | ) |                                |

**FINAL ORDER**

From July 29 to August 2, 2024, and from August 26 to August 30, 2024, pursuant to 49 U.S.C. § 60117, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), conducted a pipeline safety inspection of the procedures and records of Black Bear Transmission, LLC (BBT or Respondent) in Monroe, Louisiana, and Florence, Alabama. BBT operates 12 regulated natural gas pipelines stretching more than 1,700 miles with a total capacity of more than 2.6 billion cubic feet per day.<sup>1</sup>

As a result of the inspection, the Acting Director, Central Region, OPS (Director), issued to Respondent, by letter dated November 6, 2025, a Notice of Probable Violation and Proposed Compliance Order (Notice). In accordance with 49 CFR § 190.207, the Notice proposed finding that BBT had committed two violations of 49 CFR Part 192 and proposed ordering Respondent to take certain measures to correct the alleged violations. The Notice also included a warning item pursuant to 49 CFR § 190.205, which warned Respondent to correct the probable violation or face possible future enforcement action.

On November 7, 2025, Camstex, BBT's third party compliance contractor, informally responded to the Notice and provided additional records. By letter dated November 20, 2025, BBT informed the Acting Director that BBT sold Black Bear Transmission Opco, LLC, and its subsidiaries to Enstor Pipeline Holdings, LLC (Enstor). BBT requested an extension of time to respond to the Notice in light of the transaction. The Acting Director granted the request. Enstor, on behalf of BBT, formally responded to the Notice on December 29, 2025 (Response). BBT contested most of the allegations. BBT did not request a hearing and therefore has waived its right to one.

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<sup>1</sup> Black Bear Transmission, LLC, About, <https://www.blackbearllc.com/> (last visited Jan. 15, 2026).

## **FINDING OF VIOLATION**

The Notice alleged that Respondent violated 49 CFR Part 192, as follows:

**Item 2:** The Notice alleged that Respondent violated 49 CFR § 192.605(a), which states:

**§ 192.605(a) Procedural manual for operations, maintenance, and emergencies.**

(a) *General.* Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

The Notice alleged that Respondent violated 49 CFR § 192.605(a) by failing to follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. Specifically, the Notice alleged that BBT failed to identify four pipeline segments as affecting moderate consequence areas (MCAs), as that term is defined in section 4 of its operations and maintenance procedures and 49 CFR § 192.3. The Notice alleged four instances where BBT's GIS software only identified one of two parallel pipelines as affecting an MCA.

In its Response, BBT contested Item 2. BBT stated that the four referenced pipeline segments were identified as affecting MCAs and provided supporting records.

With respect to the first instance of violation involving Main Line 100 (10-inch) and Main Line 101 (12-inch) at coordinates 34.761758°, -88.036201°, BBT provided documentation identifying the segments as "MCA 74-1" and "MCA 74-2," respectively.<sup>2</sup> As the record demonstrates that BBT concluded that both pipelines affect an MCA, the first instance of violation is withdrawn.

With respect to the second instance of violation involving Main Line 100 (10-inch) and Main Line 101 (12-inch) at coordinates 34.746751°, -87.948997°, BBT provided documentation identifying the segments as "MCA 69-1" and "MCA 69-2," respectively.<sup>3</sup> As the record demonstrates that BBT concluded that both pipelines affect an MCA, the second instance of violation is withdrawn.

With respect to the third instance of violation involving Main Line 101 (12-inch) and Main Line 102 (16-inch) at coordinates 34.705583°, -87.672873°, BBT provided documentation identifying

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<sup>2</sup> See Operator Attach. – No. 2, Bullet 1, Picture 2 (Nov. 7, 2025).

<sup>3</sup> See Operator Attach. – No. 2, Bullet 2, Picture 2 (Nov. 7, 2025).

the segments as “MCA 15\_56-1” and “MCA 15\_56-2,” respectively.<sup>4</sup> As the record demonstrates that BBT concluded that both pipelines affect an MCA, the third instance of violation is withdrawn.

With respect to the fourth instance of violation involving Main Line 500 (12-inch) and Main Line 501 (10-inch) at coordinates 34.686055°, -86.753673°, BBT provided documentation identifying the segments as “MCA 10-1” and “MCA 10-2,” respectively.<sup>5</sup> As the record demonstrates that BBT concluded that both pipelines affect an MCA, the fourth instance of violation is withdrawn.

Based upon the foregoing, I hereby order that Item 2 be withdrawn.

**Item 3:** The Notice alleged that Respondent violated 49 CFR § 192.911(a), which states:

**§ 192.911 What are the elements of an integrity management program?**

An operator’s initial integrity management program begins with a framework (*see* § 192.907) and evolves into a more detailed and comprehensive integrity management program, as information is gained and incorporated into the program. An operator must make continual improvements to its program. The initial program framework and subsequent program must, at minimum, contain the following elements. (When indicated, refer to ASME B31.8S (incorporated by reference, *see* § 192.7) for more detailed information on the listed element.)

(a) An identification of all high consequence areas, in accordance with § 192.905.

The Notice alleged that Respondent violated 49 CFR § 192.911(a) by failing to identify all high consequence areas (HCAs). Specifically, the Notice alleged that BBT failed to identify five pipeline segments that are in HCAs.

In its Response, BBT contested three of the five instances of violation in Item 3.

With respect to the first instance of violation involving Main Line 100 at coordinates 34.949314°, -88.447764°, BBT asserted that the pipeline was rerouted and no longer affects an HCA. This assertion is unsubstantiated. BBT failed to proffer any corroborating evidence, such as alignment sheets, “As-Built” surveys, or construction records, to prove the segment's relocation. Furthermore, BBT’s claim is directly contradicted by official data. Satellite imagery from the National Pipeline Mapping System (NPMS)—updated as of February 20, 2025—shows the segment in its original location.<sup>6</sup> Therefore, I find that BBT violated 49 CFR § 192.911(a) by failing to identify Main Line 100 at coordinates 34.949314°, -88.447764° as in an HCA.

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<sup>4</sup> *See* Operator Attach. – No. 2, Bullet 3, Picture 2 (Nov. 7, 2025).

<sup>5</sup> *See* Operator Attach. – No. 2, Bullet 4, Picture 2 (Nov. 7, 2025).

<sup>6</sup> Operators are required to submit current geospatial data to PHMSA annually. *See* 49 CFR § 191.29.

With respect to the second instance of violation involving Florence-Scheffield 8 at coordinates 34.737092°, -87.678103°, BBT argued that this location does not meet the definition of an HCA because the structures are beyond the 127-foot potential impact radius (PIR). While the Acting Director relied on a 1985 satellite image showing a community college building within the PIR,<sup>7</sup> more recent evidence contradicts this finding. Google Earth satellite imagery dated July 12, 2025, confirms that the building in question has been demolished. Absent this structure, no buildings at the community college remain within the potential impact radius. I therefore withdraw the second instance of violation.

With respect to the fourth instance of violation involving Hartselle (6-inch) 8 at coordinates 34.564305°, -87.007985°, BBT argued that it treated the location as a single HCA despite a GIS error that indicated part of an apartment complex was not an HCA. BBT provided satellite imagery from its GIS software indicating that the entire apartment complex is categorized as an HCA.<sup>8</sup> BBT also provided documentation identifying the segment as “HCA 1, 11, and 12.”<sup>9</sup> I therefore withdraw the fourth instance of violation.

BBT did not contest the third and fifth instances of violation involving Florence-Scheffield 8 and Hartselle (6-inch) at coordinates 34.752806°, -87.679240° and 34.551230°, -86.995503°, respectively.

Accordingly, after considering all of the evidence, I find that Respondent violated 49 CFR § 192.911(a) only with respect to the first, third, and fifth instances of violation.

This finding of violation will be considered a prior offense in any subsequent enforcement action taken against Respondent.

### **COMPLIANCE ORDER**

The Notice proposed a compliance order with respect to Items 2 and 3 in the Notice for violations of 49 CFR §§ 192.605(a) and 192.911(a), respectively. Under 49 U.S.C. § 60118(a), each person who engages in the transportation of gas or who owns or operates a pipeline facility is required to comply with the applicable safety standards established under chapter 601. As discussed above, Item 2 and two instances of violation in Item 3 have been withdrawn. Therefore, the compliance terms proposed in the Notice for those Items are not included in this Order.

Pursuant to the authority of 49 U.S.C. § 60118(b) and 49 CFR § 190.217, Respondent is ordered to take the following actions to ensure compliance with the pipeline safety regulations applicable to its operations:

1. With respect to the violation of 49 CFR § 192.911(a) (**Item 3**), Respondent must

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<sup>7</sup> See Pipeline Safety Violation Report, Item 3B\_HCA 2 Florence-Scheffield 8.

<sup>8</sup> See Operator Attach. – No. 3, Bullet 4, Picture 1 (Nov. 7, 2025).

<sup>9</sup> See Operator Attach. – No. 3, Bullet 4, Picture 2 (Nov. 7, 2025).

update its O&M to include steps to properly identify, verify, and take any required action on HCAs within **30** days of receipt of the Final Order, for the Director's review and approval. Furthermore, BBT must submit records to demonstrate the implementation and completion of its updated O&M within **90** days of the Director's approval of the new procedures.

The Director may grant an extension of time to comply with any of the required items upon a written request timely submitted by Respondent and demonstrating good cause for an extension.

PHMSA requests that Respondent maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to the Director. 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.

Failure to comply with this Order may result in the administrative assessment of civil penalties exceeding \$200,000, as adjusted for inflation (*see* 49 CFR § 190.223 for adjusted amounts), for each violation for each day the violation continues or in referral to the Attorney General for appropriate relief in a district court of the United States.

### **WARNING ITEM**

With respect to Item 1, the Notice alleged probable violation of Part 192, but identified it as a warning item pursuant to 49 CFR § 190.205. The warning was for:

49 CFR § 192.5(d) (**Item 1**) — Respondent's alleged failure to have records that demonstrate it determined each current class location in accordance with 49 CFR § 192.5(b).

BBT presented information in its Response showing that it had taken certain actions to address the cited items. If OPS finds a violation of this provision in a subsequent inspection, Respondent may be subject to future enforcement action.

Under 49 CFR § 190.243, Respondent may submit a Petition for Reconsideration of this Final Order to the Associate Administrator, Office of Pipeline Safety, PHMSA, 1200 New Jersey Avenue, S.E., East Building, 2<sup>nd</sup> Floor, Washington, D.C. 20590, with a copy sent to the Office of Chief Counsel, PHMSA, at the same address. The written petition must be received no later than 20 days after receipt of the Final Order by Respondent. Any petition submitted must contain a statement of the issue(s) and meet all other requirements of 49 CFR § 190.243. The terms of the order, including corrective action, remain in effect unless the Associate Administrator, upon request, grants a stay. The terms and conditions of this Final Order are effective upon service in accordance with 49 CFR § 190.5.

LINDA GAIL  
DAUGHERTY

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Linda Daugherty  
Acting Associate Administrator  
for Pipeline Safety

April 30, 2026

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Date Issued