

WARNING LETTER

VIA ELECTRONIC MAIL TO: thomas.long@energytransfer.com

August 28, 2024

Mr. Thomas Long
Chief Executive Officer
Trunkline Gas Company
1300 Main Street
Houston, Texas, 77002

CPF 4-2024-040-WL

Dear Mr. Long:

A representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) reviewed Trunkline Gas Company's (Trunkline) incident report that described an unintentional release of 67.68 million cubic feet (MMCF) of gas that occurred on April 30, 2024 at the Longville Compressor Station in Longville, Louisiana.

As a result of the review, it is alleged that Trunkline has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

- 1. § 191.5 Immediate notice of certain incidents**
 - (a) At the earliest practicable moment following discovery, but no later than one hour after confirmed discovery, each operator must give notice in accordance with paragraph (b) of this section of each incident as defined in § 191.3.**

Trunkline failed to notify the National Response Center (NRC) at the earliest practicable moment following the discovery, but no later than one hour after confirmed discovery of the April 30, 2024, reportable incident, as defined in § 191.3, at the Longville Compressor Station in accordance with § 191.5(a).

On April 30, 2024, at 5:52 pm, Trunkline received an alarm for the Longville Compressor Station. Trunkline personnel arrived at the incident site at 6:04 pm and confirmed that the emergency shutdown device had been set off and that the station was blowing gas. The station vented gas for an additional 43 minutes (until approximately 6:47 pm) until personnel identified the mainline fire gate valve that failed to fully close.

On May 1, 2024, at 4:15 pm, Trunkline estimated that 67.68 MMCF of gas was released and made the notification to NRC (# 1397797) at 4:29 pm on the same day because the amount of gas released exceeded 3 MMCF. However, Trunkline waited 21 hours and 42 minutes to estimate the gas loss. Trunkline is required to calculate cost and gas volume estimates as soon as practicable following the discovery of an unintentional gas release.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023, the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679.

We have reviewed the circumstances and supporting documents involved in this case and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so may result in Trunkline Gas Company being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2024-040-WL**. 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).

Sincerely,

Bryan Lethcoe
Director, Southwest Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

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