



By Electronic Mail

June 22, 2026

Mr. Rod Seeley
Director (Interim), Southwest Region
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
8701 South Gessner, Suite 630
Houston, Texas 77074

Re: CPF 4-2026-037-NOPV

Dear Mr. Lethcoe:

Permian Express Partners (“PEP” or “the Company”) is in receipt of the Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) Notice of Probable Violation (“NOPV”) and Proposed Compliance Order (“PCO”) (collectively referred to as the “Notice”) issued on May 22, 2026 and received by PEP on the same day. The Notice alleges one (1) violation and includes a PCO requiring remedial actions to ensure compliance with the pipeline safety regulations.

The Notice provided for an opportunity to respond within 30 days of receipt which is Sunday June 21, 2026. Given that Friday June 19, 2026 is the Juneteenth National Independence Day Federal Holiday and Sunday June 21, 2026 is not a business day, PEP is submitting this timely response on the following business day of Monday June 22, 2026.

By way of background, this Notice was issued following an inspection of the PEP pipeline system in Louisiana and Texas from March 10 through June 27, 2025.

Please note that this submission contains certain 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 SPLP and provide the Company with an adequate opportunity to substantiate its claim, prepare redactions, and/or object, if warranted.

The Company appreciates PHMSA’s review and consideration of this submission and shares PHMSA’s commitment to pipeline safety, public safety, and pipeline integrity. PEP will continue to cooperate fully with PHMSA and operate its pipeline systems in compliance with all applicable sections of the federal pipeline safety regulations.

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**
Todd Nardozzi
Director – DOT Compliance

Digitally signed by
Todd Nardozzi
Date: 2026.06.22
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1. § 195.262 Pumping equipment.

(a)

(b) The following must be provided in each pump station:

(1)

(2) A device for the emergency shutdown of each pumping station

Permian Express failed to provide a device for the emergency shutdown ("ESD") of each pump station in accordance with § 195.262(b)(2). Specifically, Permian Express failed to provide ESD devices at its Midland Station and Garden City Station.

Permian Express' Engineering Standard *Pump Stations Design HL8.0104* (rev. 2/1/2020), Section 4.9 "Emergency Shutdown Systems" requires the installation of ESD systems at all treatment plants and pump stations, subject to certain exceptions. In addition, Permian Express' Engineering Standard *Pump Station ESD Systems HL8.0501* (rev. 1/18/2016), Section 4.2.3 "Manual and Automatic ESD Initiation" requires the installation of at least three manual ESD stands, and prescribes specific requirements for the location, marking, and painting of ESD stands.

On April 29, 2025, during the on-site inspections of the Midland Pump Station and the Garden City Pump Station, PHMSA personnel observed the absence of ESD devices located at either pump station. ESD devices could not be located after the PHMSA inspector and Permian Express personnel searched the stations.

Therefore, Permian Express failed to provide an ESD device for each pump station in accordance with § 195.262(b)(2).

Proposed Compliance Order

In regard to Item 1 of the Notice pertaining to Permian Express' failure to provide a device for the emergency shutdown ("ESD") of each pump station in accordance with § 195.262(b)(2), Permian Express must:

1. Develop a plan for installation of ESD devices at the Midland Pump Station and the Garden City Pump Station within **90** days of receipt of the Final Order.
2. Submit for approval to the Director, Office of Pipeline Safety, PHMSA Southwest Region (Director), within **90** days of receipt of the Final Order, the plan(s) developed in accordance with paragraph A.1.
3. Within **90** days of receipt of approval of the plan(s) developed in accordance with paragraph A.1, commence and complete installation of the ESD devices at the Midland Pump Station and the Garden City Pump Station.
4. Submit to the Director a written certification that the installation of the ESD devices at the Midland Pump Station and the Garden City Pump Station have been completed within **30** days of completion of installation.

Mr. Rod Seeley, Director (Interim)

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PEP Response

PEP acknowledges the Notice regarding § 195.262(b)(2) and without admission will undertake measures necessary to correct conditions related to ESDs at the Midland and Garden City Stations.

PEP notes that both stations were constructed circa 2014 by Sunoco Pipeline L.P. (SPLP) and the engineering standards of SPLP would have been applicable during construction including such standard(s) that addressed ESD installation. Since that time, SPLP was acquired by Energy Transfer (ET) and PEP is a joint venture company under the ET umbrella of companies and as such Engineering Standard *Pump Station ESD Systems HL8.0501* will be followed to install ESD devices at these locations.

PEP also notes that despite ESD pushbutton stands not being present during the time of the PHMSA inspection both the Midland and Garden City stations were able to be shut down locally in the event of an emergency via the Human Machine Interface (HMI). Additionally, both facilities can be shut down remotely from the Houston Control Center.

PEP Request for Modifications to the PCO

The PHMSA Post-Inspection Written Preliminary Findings were received by PEP on September 15, 2025 and the Company responded to these findings on October 16, 2025. After this response PEP began installing additional required ESD devices at the Midland and Garden City Pump Stations per company engineering standard *HL8.0501 Pump Station ESD Systems* and this work is nearing completion. As such, PEP requests that the PCO be modified as follows and has included the referenced company documents under Attachment A for PHMSA review:

1. Install ESD devices at the Midland Pump Station and the Garden City Pump Station in accordance with applicable sections of company engineering standard *HL8.0501 Pump Station ESD Systems* within **90** days of receipt of the Final Order.
2. Submit to the Director documentation confirming that the installation of the ESD devices at the Midland Pump Station and the Garden City Pump Station have been completed within **120** days of receipt of the Final Order. The documentation will consist of that which is required by company SOP *HLH.16 Emergency Shut Down System*. This SOP requires that the ESD system(s) be functionally tested during commissioning, approximating typical operating conditions as closely as reasonably possible.