



October 21, 2026

Patrick Patterson
Regional Director
Ragesh Patel
Program Manager
C. David Brown
Special Projects Section Program Manager (Act 2)
Environmental Cleanup and Brownfields
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 Main St.
Norristown, PA 19401

Re: Cover letter for PHMSA Corrective Action Order issued 9.21.2026 to Energy Transfer; Updated Request re. Twin Oaks Pipeline operated by Sunoco/Energy Transfer Pipeline in Upper Makefield Township, Bucks County, PA

Dear Director Patterson, Mr. Patel, and Mr. Brown,

We enclose a copy of the Corrective Action Order (CAO) issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS) to Energy Transfer, LP dated 9.21.26. The CAO contains information and orders measures that directly involve the pipeline systems owned and/or operated by Energy Transfer in Pennsylvania. As we are certain you are aware, this includes the Sunoco-operated Twin Oaks Pipeline in Pennsylvania and other pipelines in the “Affected Pipelines” identified in the CAO, including in other locations in Pennsylvania.

Delaware Riverkeeper Network (DRN) has contacted the Department in the past with our concerns about the failure of the Sunoco/Energy Transfer pipeline in the Mt. Eyre section of Upper Makefield Township, Bucks County resulting in the leak of liquid petroleum fuel into the environment, including drinking water supplies. Your office has communicated with DRN on this issue and sent information in response to our concerns. We are well aware that “DEP does not regulate” the pipeline operation as stated in David Brown’s email to DRN on May 5, 2025 (C. David Brown, PG, Environmental Program Manager, Environmental Cleanup & Brownfields Program, Department of Environmental Protection, Southeast Regional Office) and that DEP is carrying out its own actions under Act 2. To keep up to date, we also check your website ([Upper Makefield Pipeline Release | Department of Environmental Protection](#) |

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
dm@delawariverkeeper.org
www.delawariverkeeper.org

Commonwealth of Pennsylvania). We have attended DEP and Sunoco/Energy Transfer briefings and meetings and reviewed PHMSA orders to learn more. We have communicated directly with PHMSA, as suggested in David Brown's 5.5.25 email, and also submitted a Freedom of Information Act request, which was unfortunately denied by PHMSA based on the ongoing investigations.

We now learn from public records that PHMSA issued this CAO on September 21, 2026, but note there is no mention of the CAO or copy available through the DEP website or the Energy Transfer web page on the pipeline failure ([Background | Upper Makefield Response](#)). The public is largely unaware of this significant development in the investigations into the Twin Oaks Pipeline and now, into the entire hazardous liquid pipeline system owned and/or operated by Energy Transfer.

We write today to request two things:

- DEP takes immediate action to advocate that PHMSA order the shutdown of the Energy Transfer/Sunoco pipeline system in Pennsylvania while the investigations and remediation measures are underway and it remain shut until after the completion of the ordered actions to the satisfaction of DEP and PHMSA. If DEP doesn't feel they have the authority, we suggest you enlist the PA Attorney General's Office for assistance: <https://www.attorneygeneral.gov/>
- DEP discloses publicly through webinars, meetings, and on-line reporting the details of the CAO and how this could affect communities impacted by the Energy Transfer pipeline system, including the Upper Makefield section of pipeline under active current investigation and remediation.

The extensive measures required by the newly issued CAO must be performed expeditiously by Energy Transfer due to the threat of additional failures of this aging pipeline that already has failed in Pennsylvania (Twin Oaks pipeline) and Michigan (MTC pipeline), both for similar functional reasons. The transport of hazardous liquids, the lack of required records of repair, the presence of known weaknesses in the steel sleeves and welding used in these repairs, the location in "high consequence areas" (HCAs – due to highly populated and sensitive ecological areas – CAO, PDF P. 9), the lack of effective and reliable in-line inspections and leak detection systems used by Sunoco/Energy Transfer, and other documented threats related to the questioned integrity of the "Affected Pipeline" have led to this far-reaching PHMSA action. (PHMSA states: "The 'Affected Pipelines' means any hazardous liquid pipeline facility owned or operated by Energy Transfer, its subsidiaries, and related entities" (CAO, PDF P. 10)).

The Affected Pipelines in Pennsylvania include many, perhaps hundreds, of miles of additional pipeline as stated by PHMSA in the CAO. (CAO, PDF P. 6-7) The measures ordered by PHMSA are an enormous task that requires an "all-hands-on-deck" approach to assure the required measures are carried out as PHMSA ordered. Confidence in Energy Transfer/Sunoco has been compromised due to the problems compounded when the company did not diagnose and locate the leak when it was first reported, and other documented problems that have surfaced in the execution of the 2025 Consent Order and Consent Agreement entered into between PHMSA and Sunoco/Energy Transfer related to the pipeline failure in Upper Makefield Township.

This includes a recent transgression deemed a probable violation by PHMSA. A [news report](#) on September 11, 2025, revealed the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a Warning Letter for a probable violation of the Pipeline Safety Act. The Warning Letter stated: "Sunoco

failed to make available to PHMSA all records and information requested pertaining to compliance with the Consent Order and to the investigation of the failure in accordance with 49 U.S.C. §§ 60117(c)(2), 60118(e)(1)(A) and 49 CFR § 190.203(e). Specifically, Sunoco failed to allow PHMSA inspectors to take photographs of field notes created by Sunoco contractors during remediation work on the Twin Oaks pipeline.” A lack of trust in this company’s performance is warranted. (NOTE: This Warning Letter is also not presented on the public-facing web pages maintained by DEP and PHMSA but should be).

PHMSA states in the CAO “...PHMSA finds a high likelihood that the same conditions underlying the MTC and Twin Oaks pipeline failures remain present in Energy Transfer’s other hazardous liquid pipeline systems and that those conditions could result in additional failures”. (CAO, PDF P.9) They further state that “conditions could result in additional failures” of the pipelines, and that the pipeline “...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.” (CAO, PDF P.9) Certainly, PHMSA has elevated the threat level of the Energy Transfer pipeline system. This underscores the need for action by DEP to provide needed protection to the populations and environment in harm’s way should there be other leaks/failures in this old and compromised hazardous material pipeline system.

We reiterate our requests: (1) DEP should take immediate action to advocate that PHMSA order the shutdown of the Energy Transfer/Sunoco pipeline system in Pennsylvania while the investigations and remediation measures are underway and that it remain shut until after the completion of the ordered actions to the satisfaction of DEP and PHMSA and (2) DEP should disclose publicly through webinars, meetings, and on-line reporting the details of the CAO and explain how this could affect communities impacted by the Energy Transfer pipeline system, including the Upper Makefield section of pipeline under active current investigation and remediation.

Thank you for your consideration. We are happy to meet to further discuss these pressing issues.



Tracy Carluccio
Deputy Director
Delaware Riverkeeper Network
tracy@delawareriverkeeper.org
www.delawareriverkeeper.org

CC:

Dr. Debra L. Bogen, Secretary of Health, PA Department of Health <https://forms.health.pa.gov/health-contact-us/>

Pipeline and Hazardous Materials Safety Administration, Eastern Region phmsa.publicaffairs@dot.gov

Upper Makefield Township Board of Supervisors Info@uppermakefield.org

David R. Nyman, Township Manager, Upper Makefield Township Manager@uppermakefield.org



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

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

September 21, 2026

VIA EMAIL TO: tom.long@energytransfer.com

Thomas Long
Chief Executive Officer
Energy Transfer, LP
8111 Westchester Street
Dallas, Texas 75225

CPF 4-2026-025-CAO

Dear Mr. Long:

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). The CAO requires Energy Transfer, LP to take certain corrective actions with respect to the recent failure on Energy Transfer's Marysville – Toledo Crude pipeline system in Macomb County, Michigan.

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

Sincerely,

PAUL
ROBERTI

Digitally signed by PAUL
ROBERTI
Date: 2026.09.21
13:21:11 -04'00'

Paul Roberti
Administrator
Pipeline and Hazardous Materials Safety
Administration

Enclosure: CAO

cc: Rodrick Seeley, Acting Director, Southwest Region, Office of Pipeline Safety, PHMSA
Timothy O'Shea, Attorney Advisor, PHMSA

Daniel Wentworth, Executive Vice President of Operations, Energy Transfer, LP,
Daniel.wentworth@energytransfer.com
Chad Ingalls, Senior Vice President of Operations, Energy Transfer, LP,
Chad.ingalls@energytransfer.com
Todd Stamm, Senior Vice President of Operations, Energy Transfer, LP,
todd.stamm@energytransfer.com
Jennifer Street, Senior Vice President of Operations Services, Energy Transfer, LP,
jennifer.street@energytransfer.com
Keegan Pieper, Assistant General Counsel, Energy Transfer, LP,
keegan.pieper@energytransfer.com
Matthew Stork, Vice President of Tech Services, Energy Transfer, LP,
matthew.stork@energytransfer.com
Todd Nardozzi, Director, DOT Compliance, Energy Transfer, LP,
todd.nardozzi@energytransfer.com
Susie Sjulín, Director, DOT Compliance, Energy Transfer, LP,
susie.sjulin@energytransfer.com
Anne Blankenship, Chief Counsel, Energy Transfer, LP,
Anne.blankenship@energytransfer.com

CONFIRMATION OF RECEIPT REQUESTED

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

In the Matter of	)	
	)	
Energy Transfer, LP,	)	CPF No. 4-2026-025-CAO
	)	
Respondent	)	
	)	

CORRECTIVE ACTION ORDER

Background and Purpose

The Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), is issuing this Corrective Action Order (CAO or Order) pursuant to the authority provided in 49 U.S.C. § 60112. The CAO requires Energy Transfer, LP (Energy Transfer or Respondent) to take certain necessary corrective actions to protect the public, property, and the environment from the potential hazards associated with the continued operation of its Marysville – Toledo Crude Pipeline (MTC Pipeline). Energy Transfer owns or operates approximately 140,000 miles of gas and hazardous liquid pipelines in 44 states.

The MTC Pipeline is part of Energy Transfer’s Sunoco Products West pipeline system. Sunoco is a subsidiary of Energy Transfer that owns or operates more than 4,000 miles of hazardous liquid pipelines in 10 states. The MTC Pipeline transports crude oil approximately 130 miles from Marysville, Michigan, to Toledo, Ohio. The MTC Pipeline is constructed with pipe manufactured in 1967 with low-frequency electric resistance welded (LF-ERW) seams. LF-ERW seams of this vintage are susceptible to known integrity risks.

On September 18, 2026, a member of the public reported a release of crude oil to the local fire department in Sterling Heights, Macomb County, Michigan. The report indicated that crude oil was seeping out of the ground and flowing into a storm drain at a commercial intersection near a residential development. The local fire department notified the National Response Center (NRC) of the release. Because the release occurred in the immediate vicinity of the MTC Pipeline, the local fire department also notified Energy Transfer.

After isolating a 16-mile section of the MTC Pipeline, Energy Transfer began efforts to identify the source of the release. Those efforts included excavating and exposing several buried locations along the MTC Pipeline right-of-way around the site of the spill. On September 19, 2026, Energy Transfer confirmed that the release originated at a failed repair sleeve. Energy Transfer is unable

to locate the original repair records for that sleeve. Energy Transfer is also unable to locate records containing the information necessary to verify the original repair or ongoing integrity of eleven other sleeves installed on the MTC Pipeline.

On January 31, 2025, Energy Transfer excavated a Type A sleeve on the Twin Oaks Pipeline in Upper Makefield Township, Pennsylvania and discovered a similar release to the one in Sterling Heights, Michigan. In both instances, the release originated at a failed repair sleeve and Energy Transfer was unable to locate the original repair records for that sleeve. Energy Transfer also could not locate the repair records for four other sleeves installed on the Twin Oaks Pipeline.

Following the Upper Makefield failure, PHMSA sent Requests for Information (RFIs) to Energy Transfer requesting records for the sleeves installed on other hazardous liquid pipeline systems throughout the United States. Energy Transfer was unable to locate the original repair records or records otherwise containing the information necessary to verify the original repair or ongoing integrity of hundreds of other sleeves installed on its pipeline systems, including the repair sleeve that caused the Sterling Heights release.

Preliminary Findings

Pursuant to 49 U.S.C. § 60117, PHMSA has initiated an investigation of the recent failure that occurred on the MTC Pipeline in Sterling Heights, Michigan (Failure). The preliminary findings of PHMSA's ongoing investigation are as follows:

Sterling Heights Failure

- The MTC Pipeline is part of Energy Transfer's Sunoco Products West system. The MTC Pipeline transports crude oil approximately 130 miles from Marysville, Michigan, to Toledo, Ohio. The MTC Pipeline includes three pump stations and six breakout tanks. Approximately 109.7 miles of the MTC Pipeline passes through high consequence areas (HCAs) as defined in 49 CFR § 195.450. The MTC Pipeline is monitored by a computational pipeline monitoring (CPM) system.
- The MTC Pipeline is constructed with 16-inch, 0.281-inch wt, X52 grade, coal tar coated pipe manufactured in 1967 with LF-ERW seams. LF-ERW seams of this vintage are susceptible to known integrity risks.¹
- On September 18, 2026, a member of the public in Sterling Heights, Macomb County, Michigan, reported to the local fire department that oil was seeping out of the ground at a commercial intersection in a residential area and flowing into a nearby storm drain. The local fire department deployed containment booms at the release location and reported the

¹ See e.g., Pipeline Safety: Class Location Change Requirements, 91 Fed. Reg. 1608, 1626-27 (Jan. 14, 2026) (explaining that pre-1970 LF-ERW pipe features a widened heat-affected zone from low-frequency alternating currents, making the longitudinal seam disproportionately vulnerable to cold welds, hook cracks, and selective seam weld corrosion); Risk-Based Alternative to Pressure Testing Older Hazardous Liquid and Carbon Dioxide Pipelines Rule, 63 Fed. Reg. 59475, 59476 (Nov. 4, 1998) ("Pre-1970 electric resistance welded (ERW) and lapwelded pipelines susceptible to longitudinal seam failures exhibit the highest potential risk because of their combination of probability of failure and potential for larger volume releases as evidenced by historical records."). See also 49 CFR § 195.452(c)(1)(i) (requiring certain integrity assessments for LF-ERW seams).

spill to the NRC at 11:37 AM Eastern Time. Because the spill occurred near the MTC Pipeline, the local fire department also notified Energy Transfer of the release.

- Energy Transfer reported the spill to the NRC at 1:52 PM Eastern Time and estimated a spill volume of 15 barrels. Energy Transfer isolated an approximately 16-mile segment of the MTC Pipeline between Utica Station and 11 Mile Station.
- On September 19, 2026, following a series of excavations to identify the source of the release, Energy Transfer confirmed that the failure originated at a Type B sleeve on the MTC Pipeline. Visual observation indicated that the Type B sleeve was leaking through two holes in the longitudinal weld of the sleeve. The pipeline is surrounded by a 20-inch diameter steel casing and coated in concrete. The Type B sleeve was not coated and was installed in a cut out of the pipeline casing. Crude oil appeared to leaking through the Type B sleeve and down the length of the casing.
- A Type B sleeve is a pressure-containing method for repairing severely damaged pipe. A Type B sleeve consists of two cylindrical steel halves that are placed around the pipe and welded together longitudinally before being welded at the edges to seal the sleeve to the carrier pipe.²
- Energy Transfer has indicated that the Type B sleeve that failed in Sterling Heights was installed in 2010. Energy Transfer is unable to locate the original repair records indicating the nature of the defect repaired at the location under the sleeve. Energy Transfer is unable to produce original repair records or records containing the information necessary to verify the original installation or ongoing integrity of eleven other steel repair sleeves on the MTC Pipeline.
- The MTC Pipeline has remained shut in and out of service since September 18, 2026. A PHMSA accident investigator arrived at the failure location later that day and PHMSA has maintained a presence at the failure location since. Energy Transfer has recovered at least 15 barrels of crude oil from the failure location and the nearby storm drain. The failure location is an HCA as defined in 49 CFR § 195.450.
- Energy Transfer is taking steps to remove the failed Type B sleeve from the MTC Pipeline and has positioned pretested pipe at the failure location to install once the sleeve is removed. Energy Transfer has expressed an intent to return the MTC Pipeline to service after the new pipe is installed.

Upper Makefield Failure

- A similar release of jet fuel occurred on the Twin Oaks Pipeline in Upper Makefield Township, Pennsylvania. The Twin Oaks Pipeline is a 14-inch diameter pipeline that transports petroleum products, including jet fuel, diesel, and gasoline, from the Twin Oaks Terminal in Aston, Pennsylvania, to the Newark Terminal in Newark, New Jersey. Sun Pipe Line Company, a predecessor in interest to Sunoco, originally installed the Twin Oaks Pipeline in 1956.

² See Pipeline Safety: Advisory Bulletin on the Integrity Risks of Type A Repair Sleeves, 91 Fed Reg. 3780 (Jan. 28, 2026).

- Between 1987 and 1999, Sunoco installed 45 Type A sleeves on the Twin Oaks Pipeline to remediate damaged line pipe. A Type A sleeve is a repair method used to reinforce and maintain the structural integrity of damaged pipe. A Type A sleeve consists of two cylindrical steel halves that are placed around the pipe and welded together longitudinally. Type A sleeves are not welded to the line pipe and do not provide pressure containment.³
- On January 31, 2025, following numerous complaints of odors made by citizens over the course of several months, Sunoco excavated a Type A sleeve on the Twin Oaks Pipeline in an HCA in Upper Makefield, Pennsylvania in a residential neighborhood. The excavation revealed a failure underneath the sleeve resulting in the release of petroleum products, which contaminated the surrounding soil and several drinking water wells.
- On February 13, 2025, PHMSA issued a Notice of Proposed Safety Order (NOPSO) to Sunoco alleging that the Type A sleeves installed on the Twin Oaks Pipeline created an unacceptable integrity risk.⁴ The NOPSO proposed that Sunoco implement certain corrective measures to address that integrity risk.
- On May 2, 2025, PHMSA issued a Consent Order requiring Sunoco to undertake certain investigatory measures with respect to the Twin Oaks spill.⁵ Specifically, the Consent Order required Sunoco to, in relevant part, conduct a failure history evaluation, evaluate the performance of its leak detection system, remove and conduct metallurgical analysis of certain Type A sleeves, and complete a root cause failure analysis for the Twin Oaks Pipeline failure.
- Energy Transfer was unable to locate the original repair records for the Type A sleeve that caused the Upper Makefield release. Further, Energy Transfer was unable to locate the original repair records for four other Type A sleeves on the Twin Oaks Pipeline.
- PHMSA's investigation of the Twin Oaks Pipeline failure remains ongoing.
- On April 18, 2025, and April 17, 2026, PHMSA sent RFIs to Energy Transfer for information related to the repair sleeves installed on other hazardous liquid pipeline systems. The RFIs applied to hazardous liquid pipelines assigned to the following Operator Identification Numbers (OPIDs):
 - OPID 18718 (Sunoco), which is designated as the operator of 4,338.95 miles of hazardous liquid pipeline, including 3,402.68 miles of interstate hazardous liquid pipeline and 936.27 miles of intrastate hazardous liquid pipeline, in Delaware, Massachusetts, Michigan, New Jersey, New York, Ohio, Pennsylvania, South Carolina, Texas, and West Virginia.

³ See 91 Fed Reg. 3780.

⁴ Sunoco Pipeline LP, Notice of Proposed Safety Order, CPF No. 4-2025-054-NOPSO (Feb. 13, 2025), *available at* <https://primis.phmsa.dot.gov/enforcement-data/case/42025054NOPSO>.

⁵ Sunoco Pipeline LP, Consent Order, CPF No. 4-2025-054-NOPSO, 2025 WL 1424225 (May 2, 2025).

- OPID 32099 (Energy Transfer), which is designated as the operator of 10,717.61 miles of hazardous liquid pipeline, including 3,819.92 miles of interstate hazardous liquid pipeline and 6,897.69 miles of intrastate hazardous liquid pipeline, in Louisiana, Michigan, New Mexico, Ohio, Oklahoma, Pennsylvania, and Texas.
- OPID 7063 (Harbor), which is designated as the operator of 80.44 miles of interstate hazardous liquid pipeline in New Jersey.
- OPID 22442 (West Texas Gulf), which is designated as the operator of 583.59 miles of interstate hazardous liquid pipeline in Texas.
- OPID 32683 (Inland Corp), which is designated as the operator of 613.26 miles of interstate hazardous liquid pipelines in Ohio.
- On June 17, 2025, July 17, 2025, August 15, 2025, and July 14, 2026, Energy Transfer submitted responses to the RFIs.
- Energy Transfer's responses to the RFIs indicated, in relevant part, that sleeves with similar characteristics to the one that failed on the Twin Oaks Pipeline are installed on other Energy Transfer hazardous liquid pipelines in New Jersey, Pennsylvania, Ohio, Michigan, and Texas.
- Energy Transfer's responses to the RFIs indicated that Energy Transfer is unable to locate original repair records or records containing the information necessary to verify the original installation and ongoing integrity of steel encirclement repair sleeves installed on these other hazardous liquid pipeline systems, including the Type B sleeve that caused the Sterling Heights failure.
- Original pipe repair records contain information that is necessary to verify the proper installation and ongoing integrity of repair sleeves. Such records should include information such as the description, location and assessment of the underlying pipeline defect or anomaly, the remediation process and method used to complete the repair, such as grinding, recoating, and the process for installing the sleeve, including verification of sleeve fit-up to the carrier pipe, and applicable welding procedure and testing reports for pressure-containing Type B sleeves.⁶

⁶ See, e.g., 49 CFR §§ 195.404(c)(1) (requiring maintenance of repair records for the useful life of the pipe); 195.214(b) (requiring the retention of welding procedures and weld qualification tests).

- Steel repair sleeves can interfere with in-line inspection (ILI) tools and disrupt assessment of the underlying pipe defect. For example, magnetic flux leakage (MFL) tools, which measure metal loss, are generally unable to assess defects located beneath repair sleeves.⁷
- Steel repair sleeves present additional integrity risks. A steel repair sleeve imperfectly joined to the carrier pipe can allow water accumulation beneath the sleeve, shielding the carrier pipe from cathodic protection and creating a corrosive environment.

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 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.

PHMSA has evaluated the foregoing preliminary findings of fact as they pertain to the existing and potential additional impacts to life, property, or the environment. Considering the characteristics of the MTC Pipeline, PHMSA notes that the cause of the failure is still unknown and that the failure occurred on a pipeline segment constructed with vintage LF-ERW seams. Pre-1970 pipe manufactured with LF-ERW seams is well-understood to be susceptible to known integrity risks. Considering the characteristics of Energy Transfer's larger pipeline network, the failures underneath at least two repair sleeves, each with indications of improper installation, point to a likelihood of future failures.

Considering the route of the pipeline and the nature of the materials transported, PHMSA took into account that the MTC Pipeline passes through high population and other populated areas—locations that present significantly higher risks to human safety from a pipeline failure. The materials transported by Energy Transfer's pipeline network are hazardous: crude oil and petroleum products present acute and long-term hazards, including risks of fire, human health and

⁷ See Jager et al, "Enhancing Pipeline Integrity: A Comparative Study of Ultrasonic and Magnetic Flux Leakage Inspection Technologies," Pipeline Technology Conference, 2024: p. 5; Bruce, Gould, and Kiefner, "Pipeline Repair Using Full-Encirclement Repair Sleeves," Chemistry Engineer Key, May 10, 2025.

safety risks, and environmental hazards. PHMSA further notes that thousands of miles of Energy Transfer hazardous liquid pipeline systems pass through HCAs, which can include sensitive ecological areas and highly populated areas.

PHMSA has also evaluated the apparent inability of Energy Transfer's leak detection system to detect the failures on the MTC Pipeline and the Twin Oaks Pipeline, suggesting another failure of a similar nature could likewise go undetected. In addition, the similarity between the conditions of the sleeves located on Energy Transfer's pipeline network and the sleeves involved in the MTC and Twin Oaks Pipeline failures indicates a system-wide risk of additional similar failures. The absence of records maintained by Energy Transfer concerning the repair sleeves on the MTC Pipeline, the Twin Oaks Pipeline, and other hazardous liquid pipeline systems means the long-term integrity and ability of prior repairs to prevent future releases cannot be determined. This lack of essential information is worsened by the inability to perform certain integrity assessments beneath steel repair sleeves. Based on the above information, PHMSA finds a high likelihood that the same conditions underlying the MTC and Twin Oaks pipeline failures remain present in Energy Transfer's other hazardous liquid pipeline systems and that those conditions could result in additional failures.

Based on the foregoing evaluation of the existing and potential additional impacts to life, property, or the environment, it is hereby determined that continued operation of the Affected Segment of the MTC Pipeline and the Affected Pipelines in Energy Transfer's pipeline network, 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 completion of service.

Within 10 days of receipt of this Order, Respondent may request a hearing, to be held as soon as practicable, by notifying the Associate Administrator for Pipeline Safety in writing, with a copy to the Director, PHMSA, OPS Southwest Region. If a hearing is requested, it will be held in accordance with 49 CFR § 190.211.

After receiving and analyzing additional data in the course of this ongoing 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 an amended 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.

Corrective Measures

Definitions

Isolated Segment – The “Isolated Segment” means the approximately 16-mile segment of the MTC Pipeline that extends from Utica Station to 11 Mile Station.

Affected Segment – The “Affected Segment” means the approximately 130-mile MTC Pipeline between Marysville, Michigan, and Toledo, Ohio.

Affected Pipelines – The “Affected Pipelines” means any hazardous liquid pipeline facility owned or operated by Energy Transfer, its subsidiaries, and related entities.

Failure – The “Failure” means the leak discovered on September 18, 2026, on the MTC Pipeline near Sterling Heights, Macomb County, Michigan.

Director – The “Director” means the Director, PHMSA, OPS Southwest Region, or his or her designee.

1. **Shut Down.** Energy Transfer must not operate the Isolated Segment until authorized to do so by the Director.
2. **Operating Pressure Restriction.** Energy Transfer must reduce and maintain a twenty percent (20%) pressure reduction in the actual operating pressure along the entire length of the Affected Segment such that the operating pressure along the Affected Segment will not exceed eighty percent (80%) of the actual operating pressures in effect at 11:37 AM Eastern Time on September 18, 2026.
 - 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 10 days of receipt of this Order, Energy Transfer must provide the Director the actual operating pressures of each pump/compressor station and each main line pressure regulating station on the Affected Segment at the time of each failure and the reduced pressure restriction set-points at these same locations.
 - 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, Energy Transfer must take into account any in-line inspection (ILI) features or anomalies present in the Affected Segment to provide for continued safe operation while further corrective actions are completed.
 - e. Energy Transfer must review the pressure restriction monthly by analyzing the operating pressure data. Energy Transfer must take into account any in-line inspection (ILI) features or anomalies present in the Affected Segment and immediately reduce the operating pressure to maintain the safe operations of the Affected Segment, if warranted by the monthly review. Energy Transfer must submit the results of the monthly review to the Director. The results must include, at a minimum, the current discharge set-points (including any additional pressure reductions), and any pressure exceedance at discharge set-points.
3. **Restart Plan.** Prior to resuming operation of the Isolated Segment, Energy Transfer must 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 ground 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 specify a day-light restart and include advanced communications with local emergency response officials.
 - e. 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 in-line inspection (ILI) results, hydrostatic tests, root cause failure analysis of prior failures, aerial and ground patrols, corrosion, cathodic protection, excavations, and pipe replacements. Energy Transfer must address any findings that require remedial measures to be implemented prior to restart.
 - f. 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 Energy Transfer's operations and maintenance procedures manual.
4. **Return to Service.** After the Director approves the Restart Plan, Energy Transfer may return the Isolated Segment to service but the operating pressure must not exceed eighty percent (80%) of the actual operating pressure in effect at 11:37 AM Eastern Time on September 18, 2026, in accordance with Item 2 above.
 5. **Removal of Pressure Restriction.** The Director may allow the removal or modification of the pressure restriction upon a written request from Energy Transfer 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.
 6. **Temporary Modification of Pressure Restrictions.** The Director may allow the temporary removal or modification of the pressure restrictions upon a written request from Energy Transfer 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 the Failure causes and provision of evidence that preventative and mitigative actions taken by the operator provide for the safe operation of the Affected Segment during the temporary removal or modification of the pressure restriction. Appeals to determinations of the Director in this regard will be decided by the Associate Administrator for Pipeline Safety or his designee.
 7. **Mechanical and Metallurgical Testing.** Within 45 days of receipt of this Order, Energy Transfer must complete mechanical and metallurgical testing and failure analysis of the failed pipe segments, including analysis of soil samples and any foreign materials, and submit the results to the Director for review. Energy Transfer must submit the completed final report of this testing and analysis to the Director for review and approval. Energy Transfer must ensure that all reports, whether draft or final, are made available in their entirety to the Director at the same time they are made available to Energy Transfer. Soil

analysis and mechanical and metallurgical testing must be conducted by an independent third-party approved by the Director prior to commencing testing and must document the decision-making process and all factors contributing to the Failure. Respondent must complete the testing and analysis as follows:

- a. Document the chain-of-custody when handling and transporting the failed pipe sections and other evidence from the sites of the Failure.
 - b. Within 10 days of receipt of this Order, develop and submit the testing protocol and the proposed testing laboratory to the Director for prior approval.
 - c. Prior to beginning the soil analysis and 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 Energy Transfer.
8. **Root Cause Failure Analysis.** Within 90 days following receipt of this Order, Energy Transfer must complete a root cause failure analysis (RCFA) for the Failure and submit a final report of this RCFA to the Director for review and approval. No later than 30 days following receipt of this Order, Energy Transfer must provide the scope and protocol of the RCFA to the Director for review and approval. The RCFA must be conducted by an independent third-party, different from the independent third-party performing the mechanical and metallurgical testing required in paragraph 7 above, approved by the Director prior to commencing the analysis, and must document the decision-making process and all factors contributing to the Failure. Energy Transfer must direct the third-party to engage in once-a-week calls with PHMSA to provide updates as to the progress of the RCFA. These calls shall be done virtually and continue until the RCFA has been submitted to the Director. Energy Transfer must ensure that all reports, whether draft or final, are made available in their entirety to the Director at the same time they are made available to Energy Transfer. The final report must include findings, and any lessons learned and whether the findings and any lessons learned are applicable to other locations within Energy Transfer's pipeline system.
9. **Records Verification.** As recommended in PHMSA Advisory Bulletin 2012-06, Energy Transfer must verify the records for the Affected Segment to confirm the maximum operating pressure. Energy Transfer must submit documentation of this record verification to the Director within 15 days of receipt of this Order.
10. **Remedial Work Plan (RWP).**
 - a. Within 60 days of approval of the RCFA required above, Energy Transfer 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 Energy Transfer will use to verify the integrity of the Affected

Segment. It must address all known or suspected factors and causes of the Failure. Energy Transfer should consider both the risk of another failure and the consequence of another failure to develop a prioritized schedule for RWP related work along the Affected Segment.

- e. The RWP must include a procedure or process to:
 - i. Identify pipe in the Affected Segment with characteristics similar to the contributing factors identified for the Failure.
 - ii. Gather all data necessary to review the failure history (in service and pressure test failures) of the Affected Segment 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 Segment. Pre-existing operational data includes, but is not limited to, 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 are likely to exist elsewhere on the Affected Segment. Conduct additional field tests, inspections, assessments, and/or evaluations to determine whether, and to what extent, the conditions associated with the Failure and other failures from the failure history (see (e)(ii) above) or any other integrity threats are present elsewhere on the Affected Segment. At a minimum, this process must consider all failure causes and specify the use of one or more of the following:
 - 1) Inline inspection (ILI) tools that are technically appropriate for assessing the pipeline system based on the cause of the Failure and that can reliably detect and identify anomalies,
 - 2) Hydrostatic pressure testing,
 - 3) Corrosion control methods including cathodic protection and coating evaluations, close-interval surveys, evaluation of stray current, and stress corrosion cracking and selective seam corrosion surveys, if applicable,
 - 4) Other tests, inspections, assessments, and evaluations appropriate for the cause of the Failure.

Note: Energy Transfer 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 Failure.

- v. Describe the inspection and repair criteria Energy Transfer will use to prioritize, excavate, evaluate, and repair anomalies, imperfections, and other identified integrity threats, including those related to processes applied per (e)(iv) above. Include a description of how any defects will be graded and a schedule for repairs or replacement.
 - vi. Based on the known history and condition of the Affected Segment, describe the methods Energy Transfer will use to repair, replace, or take other corrective measures to remediate the conditions associated with the Failure and to address other known integrity threats along the Affected Segment. The repair, replacement, or other corrective measures must meet the criteria specified in (e)(v) above.
 - vii. Incorporate findings and lessons learned in response to the Failure in all related programs and procedures to ensure the ongoing safe operation of the Affected Segment considering the results of the analyses, inspections, and evaluations resulting from actions taken in response to this Order.
 - f. Include a proposed schedule for completion of the RWP.
 - g. Energy Transfer 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. Energy Transfer must submit any plan revisions to the Director for prior approval. The Director may approve plan revisions incrementally. Any and 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 (CDR).
 - h. Energy Transfer must implement the RWP as it is approved by the Director, including any revisions to the plan.
11. **Repair Sleeve Inventory.** Within 90 days following receipt of this Order, Energy Transfer must provide to the Director an inventory of all steel encirclement repair sleeves installed on the *Affected Pipelines*. To the extent Energy Transfer is unable to determine if a given repair sleeve is a Type A or Type B sleeve, the sleeve must be included as a Type A sleeve. The inventory must include the following information for each steel encirclement repair sleeve, or otherwise indicate that the information is unknown:
- a. Installation date
 - b. Type of defect or anomaly repaired
 - c. Material characteristics (including age, grade, length, thickness, coating, wrap, and use of epoxy)
 - d. Method of end sealing
 - e. Sleeve fit up measurements
 - f. Personnel (operator or contractor) responsible for installation
 - g. Procedure used for installation

- 12. Review of Prior In-line Inspection (ILI) Results.** Within 30 days following receipt of this Order, Respondent must conduct a review of any previous ILI results of the *Affected Pipelines*. In its review, Energy Transfer must re-evaluate all ILI results from the past 10 calendar years, including a review of the ILI vendors' raw data and analysis. Energy Transfer must determine if conditions similar to those contributing to the failure of the Twin Oaks Pipeline and the MTC Pipeline are likely to exist elsewhere on the *Affected Pipelines*. Energy Transfer must submit documentation of this ILI review to the Director within 45 days following receipt of this Order as follows:
- a. List all ILI tool runs, tool types, and the calendar years of the tool runs.
 - b. List, describe (type, size, wall loss, etc.), and identify the specific location of all ILI features with similar characteristics present elsewhere on the *Affected Pipelines*.
 - c. Explain the process used to review the ILI results and the results of the reevaluation.
- 13. Repair Sleeve Integrity Plan.** Within 120 days of receipt of this Order, Energy Transfer must provide to the Director for approval a plan to evaluate the integrity of each steel encirclement repair sleeve on the *Affected Pipelines*. In preparing that plan, Energy Transfer must consider type, characteristics (size, depth, orientation), and other integrity considerations of the anomaly(ies) or defect(s) reinforced by the sleeve; sleeve characteristics (age, grade, length, thickness, coating, wrap, use of epoxy); cathodic protection; inline inspection results; nondestructive evaluation or testing records; and any other relevant factors in evaluating the integrity of a repair sleeve. The plan must provide for the removal of each steel encirclement sleeve on the *Affected Pipelines* whose integrity cannot be reasonably assured. The plan must be part of the Sleeve Remediation Plan developed in Item 14 below. For any sleeve not removed, the plan must provide a technical justification for the sleeves remaining on the *Affected Pipelines* and describe the additional pipeline integrity management measures to be implemented to ensure the safety and integrity of the *Affected Pipelines* in light of any integrity risk related to the sleeve.
- 14. Sleeve Remediation Plan (SRP).**
- a. Within 120 days following receipt of this Order, Energy Transfer must submit a Sleeve Remediation Plan (SRP) to the Director for prior approval.
 - b. The Director may approve the SRP incrementally without approving the entire SRP.
 - c. Upon approval by the Director, the SRP becomes incorporated by reference into this Order.
 - d. The SRP must specify the tests, inspections, assessments, evaluations, and remedial measures Respondent will use to verify the integrity of the *Affected Pipelines*. It must address all known or suspected factors and causes of the Twin Oaks Pipeline failure and the MTC Pipeline failure. Energy Transfer must consider the risks and consequences of another failure to develop a prioritized schedule for RWP-related work along the *Affected Pipelines*.
 - e. The SRP must include a procedure or process to:
 - i. Identify pipe in the *Affected Pipelines* with characteristics similar to the

contributing factors identified for the Twin Oaks Pipeline failure and the MTC Pipeline failure

- ii. Gather all data necessary to review the failure history (in service and pressure test failures) of the *Affected Pipelines* 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 and root cause failure analysis of the Twin Oaks Pipeline failure and the MTC Pipeline failure, together 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 of the Twin Oaks Pipeline and the failure of the MTC Pipeline are likely to exist elsewhere on the *Affected Pipelines*.
- v. Conduct additional field tests, inspections, assessments, and evaluations to determine whether, and to what extent, the conditions associated with the failure of the Twin Oaks Pipeline and the failure of the MTC Pipeline, together with other failures from the failure history (see (e)(ii) above) or any other integrity threats are present elsewhere on the *Affected Pipelines*. 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 causes of the Twin Oaks Pipeline failure and the MTC Pipeline failure 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: Energy Transfer 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 Twin Oaks Pipeline failure and the MTC Pipeline failure .

- vi. Describe the inspection and repair criteria Energy Transfer 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 Pipelines*, describe the methods Energy Transfer will use to repair, replace, or take other corrective measures to remediate any factors known or suspected to have caused the Twin Oaks Pipeline failure and the MTC Pipeline failure, and to address other known integrity threats along the *Affected Pipelines*. 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 Pipelines* 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 SRP.
 - g. Energy Transfer must revise the SRP as necessary to incorporate new information obtained by the results of actions undertaken pursuant to this Order, and/or 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.
 - h. Implement the SRP as it is approved by the Director, including any revisions to the plan.

15. **Third-Party Facilitator.** The SRP components described in paragraphs (d) and (e) of Item 14 must be facilitated by an independent third-party with relevant expertise approved by the Director. Any documentation from the third-party facilitator must be included in each required submission to the Director.

16. **CAO Documentation Report (CDR).** Energy Transfer must create and revise, as necessary, a CAO Documentation Report (CDR). When Energy Transfer 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 Energy Transfer 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 not be limited to:
 - i. Table of Contents;
 - ii. Summary of the pipeline Failure, and the response activities;
 - iii. Summary of pipe data and properties and all prior assessments of the Affected Segment and Affected Pipelines;
 - iv. Summary of all tests, inspections, assessments, evaluations, and analysis required by the 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 Energy Transfer 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. Documentation of all actions taken by Energy Transfer to implement Items 11–14 of this Order, the results of those actions, and the inspection and repair criteria used;
 - x. Lessons learned while completing this Order;
 - xi. A path forward describing specific actions Energy Transfer will take on its entire pipeline system as a result of the lessons learned from work on this Order; and
 - xii. Appendices (if required).
17. **Reporting.** Energy Transfer must 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 November 1, 2026, covering the period through the date the first quarterly report is submitted. The Director may change the interval for the submission of these reports.
18. **Documentation of the Costs.** It is requested that Respondent maintain documentation of the costs associated with implementation of this CAO. Include in each quarterly 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.

Administrative Actions

19. **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.

20. **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.

Be advised that all material submitted 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).

In your correspondence on this matter, please refer to “**CPF No. 4-2026-025-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 Associate Administrator for Pipeline Safety or his or her designee. Decisions of the Associate Administrator or his or her designee 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.

PAUL
ROBERTI

Digitally signed by PAUL
ROBERTI
Date: 2026.09.21
13:21:53 -04'00'

Paul Roberti
Administrator
Pipeline and Hazardous Materials
Safety Administration

September 21, 2026

Date Issued