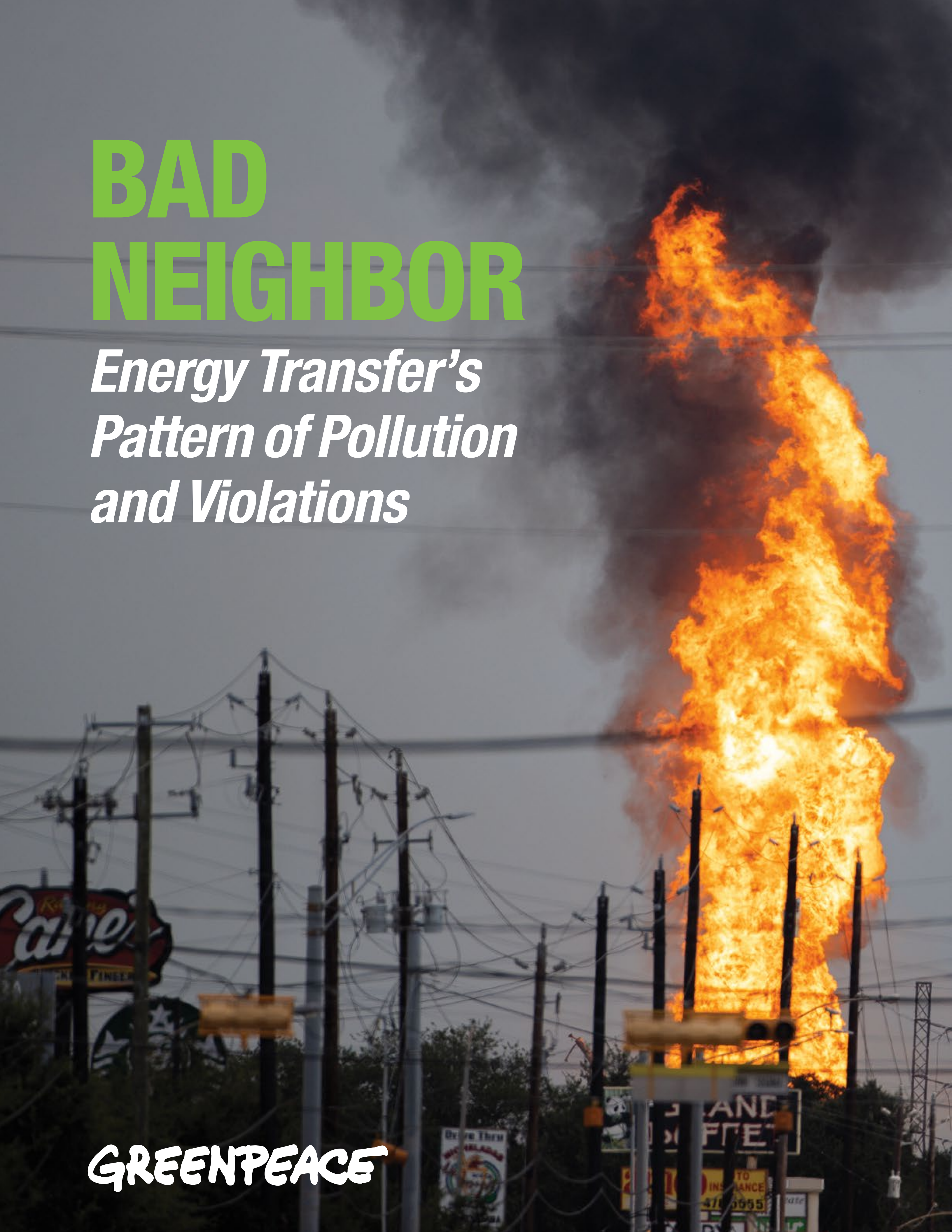
BAD NEIGHBOR

Energy Transfer's Pattern of Pollution and Violations



GREENPEACE

Greenpeace is a network of independent campaigning organizations that uses peaceful protest and creative communication to expose global environmental problems and to promote solutions that are essential to a green and peaceful future.

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Greenpeace USA
1300 I (Eye) Street NW
Suite 1100 East
Washington, DC 20005
Tel: (202) 462-1177

Authors: Tim Donaghy, Ph.D. and Johanna Fornberg, Ph.D.

Special Thanks To: Deepa Padmanabha, Marco Simons, Amy Jacobson, Nathaniel Green, Daniel Simons, Charlie Cray, Rolf Skar, Payal Sindha, Lindsay Bigda, Madison Carter, Andres Chang, Aidan Farrow, Jerry Jose, Sara Sneath, Material Research L3C

Spanish Translation by:
Blackbird Translations Limited

Designed by: Kyle McKibbin

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Allies from all over the country came to Dallas to show solidarity with Greenpeace at the Free Speech Rally during the We Will Not Be Silenced Week of Action. (Credit: Jinni J, Greenpeace)

EXECUTIVE SUMMARY

Energy Transfer (ET) has grown to become one of the largest midstream oil and gas companies in the U.S. The company says that their pipelines transport approximately 30% of U.S. natural gas and 40% of U.S. crude production, and that their pipeline network could wrap around the Earth almost five times. This report reveals — via a thorough examination of publicly available information on reported spills, explosions, pollution, and poisoned water supplies — that where those pipelines run, trouble often follows.

In just the past fourteen months, ET's pipelines have been involved in four major disasters, each involving a different fossil fuel product:

- **September 2024 — Texas:** A pipeline carrying natural gas liquids exploded in a residential neighborhood near Houston after a vehicle hit a valve. The fire reportedly raged for three days, damaged five homes, and forced more than 1,000 nearby homes, businesses, and schools to shelter in place.
- **February 2025 — Pennsylvania:** The preliminary investigation of the federal regulator found that a petroleum products pipeline experienced "a leak in a high consequence area for at least 16 months" and contaminated local drinking water wells in Upper Makefield Township.
- **May 2025 — Texas:** Crude oil from a pipeline spill flowed into a water treatment plant and reportedly closed a popular bird-watching site. Initial estimates suggest at least $5 million in cleanup costs.
- **January & May 2025 — Offshore:** Massive failures of an undersea natural gas pipeline released huge amounts of methane, including the second-largest release reported to the federal pipeline regulator since 2010.

The trouble isn't limited to these disasters. Federal safety data show ET's liquids pipelines had 300 reported incidents from 2018 through June 2025 — an average of one **every nine days** — spilling enough to fill five Olympic swimming pools. ET's gas pipelines saw 177 separate incidents from 2010 to June 2025.

Energy Transfer has expanded its footprint in the Permian Basin in Texas and New Mexico. Reporting of satellite, flyover, and on-the-ground **observations of ET facilities finds it to be a notable methane emitter**. In 2023, ET reported nearly 20 million metric tons of greenhouse gases were directly emitted from its facilities. We estimate that the emissions from combusting the oil and gas that ET transported in 2023 would be **more than 70 times larger** than ET's reported direct emissions.

Alongside greenhouse gas emissions, oil and gas facilities emit other forms of air pollution that harm public health and leave ET's neighbors paying the price. Preliminary estimates from applying the EPA's COBRA tool

Construction of the Bayou Bridge Pipeline in Acadia Parish, Louisiana. (Credit: Julie Dermansky, Greenpeace)

A warning sign is located near a home adjacent to the Mariner East 2 pipeline construction site in East Goshen, PA. (Credit: Jane Shea)

suggest that a single year of air pollution from 90 Energy Transfer facilities in Texas is associated with 16-22 premature deaths, along with hundreds of millions in health-related costs.

Energy Transfer, Sunoco, and their subsidiaries and joint ventures have faced enforcement actions from federal, state, and local regulators. This report shows they have been **fined more than $100 million over the last three decades** for air and water pollution, contaminating drinking water, worker safety violations, and unlawful business conduct. Some of those penalties even came with criminal charges.

While penalties in the millions may seem substantial to the public, for large corporations, regulatory fines are often treated as a routine cost of doing business. For example, in some of the most notable incidents documented in this report Energy Transfer entities were found to have polluted lakes, streams, and wetlands — but received monetary penalties of a few million dollars or lower. For one massive drilling fluid spill in Ohio, Energy Transfer to date seems to have avoided significant state and federal penalties entirely. On top of this, Energy Transfer has filed multiple lawsuits that seek to challenge the authority of federal regulators on constitutional grounds. While we don't know how these cases will resolve, they could significantly upend federal regulation of pipeline safety.

Contrast this pattern to the jury verdict of over $666 million against the Greenpeace defendants in March 2025. The Greenpeace defendants maintain that this lawsuit is a SLAPP and plan to appeal post-judgment. If ultimately successful this lawsuit could weaken two pillars of public advocacy: free speech and peaceful protest. **There's something wrong with a system that lets polluters off the hook but penalizes those who oppose them**.

INTRODUCTION

All fossil fuel companies generate air and water pollution as a result of their operations.[1] This pollution is a threat to the health and well-being of their closest neighbors, but the impacts don't stop there.[2] Fossil fuel pollution can spread regionally and create health risks for people living far from its source, to say nothing of the global climate impacts of greenhouse gas emissions.[3] These harms are not evenly shared,[4] but the U.S. fossil fuel industry is now so sprawling that few areas of the U.S. remain unaffected by these pollution and climate threats.[5]

The fossil fuel industry is the definition of a **bad neighbor**.

It is therefore no surprise that the industry faces vocal opposition and protest when it seeks to expand. This opposition takes many forms, from frontline communities fighting refinery pollution to farmers angry about the use of eminent domain.[6] This opposition and protest is a healthy part of political debate in this country. People have a bedrock right to criticize the powerful, and never more so than when the actions of the powerful are causing them direct harm.

The current political and economic systems in the U.S. reflect the power of the fossil fuel industry and are oriented towards allowing ever-increasing fossil fuel extraction and expansion.[7] Donald Trump was returned to power with the support of numerous fossil fuel executives, and he has embarked on a campaign to withdraw the U.S. from the Paris Climate Accords, boost fossil fuel extraction, roll back rules against pollution, and punish his critics.[8]

We need to defend the role of free speech and peaceful protest now more than ever. The health of our planet and common home, and all of us who live here, depends on it. We will not be silenced.

Energy Transfer LP is one of the largest midstream oil and gas companies in the U.S.[9] Beginning in 2017, ET filed back-to-back lawsuits against Greenpeace in the U.S. and Greenpeace International,[10] leading to a jury verdict of over $666 million in March 2025.[11] The Greenpeace defendants maintain that this lawsuit is a SLAPP (a Strategic Lawsuit Against Public Participation) and plan to appeal post-judgment.[12] If ultimately successful this lawsuit could weaken two pillars of public advocacy — free speech and peaceful protest. Greenpeace International has filed a lawsuit against Energy Transfer in the Netherlands citing the European Union's anti-SLAPP directive.[13]

Energy Transfer's co-founder Kelcy Warren is a Trump supporter who has given large contributions to all three of Trump's campaigns, and the company is already benefiting from Trump's aggressive actions.[14] In the first half of 2025, Warren and Energy Transfer reportedly donated a combined

Billboard calling for pipeline safety toured around Washington, DC following an explosion at ET's Justice pipeline in September 2024. (Credit: Ken Cedeno, Greenpeace)

Greenpeace USA delivers a Free Speech message to ET's Dallas headquarters in 2024. (Credit: Laura Buckman, Greenpeace)

$25 million to the pro-Trump political action committee MAGA Inc., placing them among the group's biggest donors.[15]

In 2012, Energy Transfer merged with Sunoco, Inc., a fuel refining, distribution and retail company founded in 1886, and acquired their large network of assets.[16] In recent years, Energy Transfer has grown by acquiring and merging with other midstream companies, including SemGroup (2019), Enable Midstream (2021), Woodford Express (2022), Lotus Midstream (2023), Crestwood Equity Partners (2023), WTG Midstream (2024), and others.[17] Energy Transfer's vast and complex network of pipelines and other facilities now plays a large and central role in our fossil fuel economy. As of 2023, ET claimed that its network carried "approximately 30% of the natural gas transported" and "approximately 40% of the crude oil produced" in the United States.[18]

This report summarizes public information on the pollution footprint of Energy Transfer's network. We detail the company's history of pipeline spills, leaks, fires and explosions; the greenhouse gas emissions associated with their business; air pollution from some of their facilities; their history of violations and fines. We also take a look at recent legal and political actions they have taken that could harm consumers, communities, and workers.

In their public communications, Energy Transfer routinely emphasizes their safety record and environmental sustainability,[19] and that the company works hard and invests significant sums to minimize pollution[20] and accidents[21] such as those detailed in this report. However, oil and gas are inherently risky energy sources, both due to pollution from normal operations, and the ever-present risk of accidents. Like all oil and gas companies, ET's track record shows that those remaining risks are non-zero and pose serious threats to the public's health and safety. And, like all fossil fuel companies, ET's core business of transporting oil and gas is not aligned with scenarios to limit global warming to safe levels.

Energy Transfer also likes to emphasize the countless ways oil and gas are the foundation of our modern economy, but it is a false premise that we cannot minimize their harms or replace them with better options over time. A good question to ask is who benefits from oil and gas expansion — and who pays the cost?

PIPELINE SPILLS AND RELEASES

Energy Transfer is first and foremost a pipeline company. An Operations Map hosted on their website[22] shows a large national network of pipelines that transport natural gas, crude oil, refined petroleum products, and natural gas liquids (NGLs)[23] — as well as regions where they operate gas and crude gathering pipelines.[24] As of 2023, Energy Transfer reported ~100,875 miles of natural gas pipelines, ~14,500 miles of crude oil trunk and gathering pipelines, ~5,700 miles of NGL pipelines, and ~3,760 miles of refined petroleum product pipelines.[25] The company says their pipeline network could encircle the Earth almost five times.[26]

The federal government has found that "transportation of crude oil by pipeline has inherent risks to the public and environment" including pipeline ruptures, fires and explosions.[27] When pipelines in the U.S. spill or leak, that incident is typically reported to the Pipeline and Hazardous Materials Safety Administration (PHMSA). PHMSA provides detailed public datasets on hazardous liquids spills and natural gas releases from pipelines.[28] Energy Transfer reports three types of hazardous liquids spills to PHMSA — crude oil spills, refined petroleum product spills, and highly volatile liquid (HVL) spills[29] — in addition to releases from natural gas pipelines.

On top of spills and natural gas releases, pipeline companies are also at risk for dangerous instances when fires and explosions occur due to accidents, safety issues, and other causes. These events can have deleterious impacts on community well-being, and lead to significant water and air pollution beyond what is seen in normal operating scenarios.

Hazardous Liquids Spills

In 2018, Greenpeace USA and Waterkeeper Alliance published an analysis of spills from Energy Transfer and Sunoco's pipeline network from 2002 to the end of 2017.[30] That report documented 527 hazardous liquid spills from "ETP, Sunoco and their subsidiaries and joint ventures" during that time period.[31] For this report, we extend that analysis to document all reported hazardous liquid incidents from January 2018 through June 2025.

During this time period we find Energy Transfer's subsidiaries and joint ventures[32] suffered an additional 300 incidents, an average of one every 9.1 days.[33] These 300 incidents released a total volume of 91,290 barrels — over 3.8 million gallons, enough to fill nearly six Olympic-sized swimming pools. Of these events, 249 (31,859 barrels) were crude oil spills, 30 (6,838 barrels) were refined petroleum product spills, and 21 (52,593 barrels) were HVL spills.[34] These new incidents bring the total to 827 incidents from 2002 through June 2025.[35]

The hazardous liquid spill volumes discussed here and elsewhere in this report are estimated by the pipeline operator and submitted to PHMSA as part of the incident report. The volumes discussed in the report are unintentional spill volumes, and do not include volumes released intentionally or volumes recovered, unless otherwise noted. Of the 300 incident report records, 276 have been designated as "final" by the operator. See the Appendix for more discussion of the data and a link to the full dataset used for this analysis.

One of the largest of these incidents (in terms of operator-estimated unintentional volumes released) was the explosion on the Justice Pipeline in Deer Park, TX on September 16, 2024. The explosion occurred in a populated region near Houston and began when a SUV crashed into an above-ground pipeline valve. The released hydrocarbons reportedly ignited and created a towering flame that burned for over three days until the fuel in the pipeline was exhausted.[36] Reportedly, the driver of the vehicle perished, four people were injured, five homes were damaged by the blast, and a shelter-in-place order affected more than 1,000 nearby homes, businesses, and schools.[37]

That incident saw the release (and combustion) of 38,793 barrels of HVLs, which makes it the fourth largest hazardous liquids pipeline incident (by volume) of any type since 2010.[38] Energy Transfer's incident report estimated air emissions of over 18,000 pounds of nitrous oxides, 37,000 pounds of carbon monoxide, and 383,000 pounds of VOCs.[39] The Justice Pipeline reportedly transports a mix of natural gas liquids from fields in West Texas to ET's fractionator facility at Mont Belvieu.[40] From there individual streams of ethane, propane, and butane are transported to ET's Nederland Terminal, where some are exported overseas.[41]

Since 2018, there have been an additional 19 liquids pipeline incidents of an estimated 1,000 barrels or greater, including the following incidents.

- In May 2025, a reported 6,600 barrels of crude oil were released near Ft. Worth and Arlington TX. According to the incident report, the spill occurred where a sewer line that crossed under the pipeline failed and was "expelling sewage into the immediate area."[42] Crude oil then traveled through the broken sewer pipe and contaminated the Village Creek Wastewater Treatment Plant a few miles away. A report by the U.S. EPA described observations of crude oil in various parts of the treatment plant, as well as a "very light sheen" where the facility discharges water into a local river.[43] According to a Fort Worth water utility spokesperson, some oil did reportedly enter the water treatment system where it disrupted the "beneficial microbes" that help to treat the wastewater.[44] The oil-contaminated sludge was being stored at the nearby Village Creek Drying Beds, which had been a popular spot for bird-watching, but which was reportedly closed to the public following the spill.[45] An investigation into the cause of the spill is ongoing, but initial estimates put the cost of cleaning up the treatment plant at "$5 million or more."[46]

- In January 2020, 6,031 barrels of crude oil reportedly leaked from a storage tank into a containment dike at the Patoka Terminal. The terminal is a tank farm located in Patoka, IL that is the southern terminus of the Dakota Access Pipeline (DAPL)[47] and which is a hub for several other pipelines. The spill was reported by Permian Express Partners.[48]

Crude oil removal following a pipeline release in Tarrant County, Texas. (Credit: U.S. Environmental Protection Agency)

- Two large crude oil spills occurred on the Mid-Valley Pipeline — 4,345 barrels in June 2022 and 1,974 barrels in December 2023.[49] This pipeline went into operation in 1950 and has experienced numerous problems over the years,[50] including previous large spills in 2005, 2008, and 2014.[51] The 2022 spill reportedly occurred when a worker using a mower to clear the pipeline right of way hit and damaged the pipeline. The spill entered nearby Horse Creek and was reportedly the second largest spill in Tennessee history.[52]

- In February 2021, a pump station near Sweetwater, TX spilled 2,608 barrels of refined petroleum products. The incident report noted that the "product had migrated off the station property onto an adjacent property."[53]

- In February 2022, 1,900 barrels of crude oil spilled near Tuttle, OK. The incident report noted that "leaking crude oil migrated to a nearby pond where it was discovered by the landowner."[54]

- In September 2023, excavation damage caused the Centurion Pipeline to spill 1,684 barrels of crude oil near Oklahoma City, OK.[55] The pipeline rupture reportedly created a "geyser of oil," some of which reportedly flowed into the storm drains, although the company reported that all the oil was recovered and there were no impacts to water resources.[56] The spill occurred near a residential area, and the U.S. EPA conducted air monitoring of VOCs and benzene at 43 locations around the spill site. VOCs above 1 ppm were detected at five of those sites, one of which was located in the nearby neighborhood. At that residential site, EPA reported detecting benzene at 0.03 ppm.[57]

- In April 2022, 1,220 barrels of gasoline[58] spilled near Perrysburg, OH.[59]

- In March 2023, 1,094 barrels of crude oil spilled near Corsicana, TX. The incident report noted that "25 barrels of the total volume migrated off operator property and reached Mesquite Branch Creek."[60]

- Seven of these large spills were HVL releases (including one where the volume was largely reported as an intentional release), reflecting Energy Transfer's growing NGL business. Unlike the Justice pipeline explosion in Deer Park, these releases did not ignite. However, one butane spill in Erie, MI in August 2021 was similarly the result of a two-vehicle car crash,[61] and resulted in local evacuations as well as stoppage of vehicle and train traffic in the area.[62]

However, it is not only the largest spills that pose serious threats to communities. On January 31, 2025 Sunoco Pipeline discovered a leak on the Twin Oaks Pipeline in Upper Makefield Township, PA.[63] PHMSA's preliminary findings indicated that "Local drinking water wells are contaminated with JP-8 jet fuel to varying degrees. Jet fuel apparently has entered the aquafer [sic] and is detected in various quantities in surrounding drinking water wells to the east of the Failure location."[64]

While the leak was only discovered in January 2025, locals had reported the smell and taste of gasoline in their water as early as September 2023, and repeatedly during 2024.[65] PHMSA's preliminary investigation indicated "the Pipeline experienced a leak in a high consequence area for at least 16 months," although Sunoco disputed this claim.[66] While the total volume of the leak is uncertain, Sunoco's initial release estimate was 156 barrels.[67] PHMSA found the leak originated from a section of the pipeline that had previously been repaired in 1995 by installing a "sleeve" to reinforce a "dent."[68]

Pennsylvania DEP ordered Energy Transfer to provide bottled water and water treatment systems to affected community members[69] and PHMSA issued a consent order in May requiring a plan to reduce the pipeline's operating pressure, review the pipeline's integrity, and conduct remedial work where needed.[70] Although the pipeline was reportedly restarted days after the leak discovery, state and federal elected officials and locals have called for the pipeline to be shut down until the investigation is completed.[71]

Crude oil removal at Village Creek Wastewater Treatment Plant. (Credit: U.S. Environmental Protection Agency)

Residents filed a class action lawsuit on behalf of residents of Bucks County against Sunoco Pipeline LP, Energy Transfer LP, and Energy Transfer (R&M) LLC on March 26, 2025.[72] According to the plaintiffs' law firm, over 200 residents have joined the lawsuit.[73] The lawsuit alleges that the pipeline owners "failed to properly investigate the Pipeline Leak, failed to identify and contain the Pipeline Leak, and have still not disclosed the full extent of the disaster."[74] In a June 24 court filing, the defendants stated that they have "taken responsibility for the release." While the defendants admit that "free product" has been found in the wells of six homes (who are not part of the class action), they claim that "No petroleum product from the release has been detected on Plaintiffs' property."[75] ET is also appealing a judge's denial of their attempt to move the lawsuit to federal court.

At a community meeting on September 15, 2025, both residents and elected officials reportedly expressed frustration at "a lack of transparency" around the scope of the spill and the cleanup efforts.[76]

PHMSA spill reports highlight the potential for severe consequences for workers and local residents. Of the 300 incidents reported since 2018, two injuries requiring inpatient hospitalization were reported for local operating personnel.[77] A total of 10 hazardous liquid events reported to PHMSA involved fires since 2018.

The most common reported causes of the spills were equipment failure (109 events, more than one-third of all incidents), followed by corrosion (101), incorrect operation (34), and material failure of pipe or weld (15).[78] The spills caused a total of at least $96 million in property damage, according to the incident reports submitted to PHMSA.[79]

Six of the hazardous liquid incidents resulted in wildlife impacts, and another 246 records (over 80% of all hazardous liquids reports by the company) indicated soil contamination had occurred as a consequence of the incident. Water contamination occurred in 25 events, including seven incidents of groundwater contamination one of which (Upper Makefield Township) contaminated drinking water. 129 incidents affected what PHMSA considers to be High Consequence Areas (HCA), and 96 occurred in highly-populated areas, underscoring the proximity of these incidents to communities.[80]

The three maps below show all hazardous liquid spills, by type, from 2002 through June 2025.

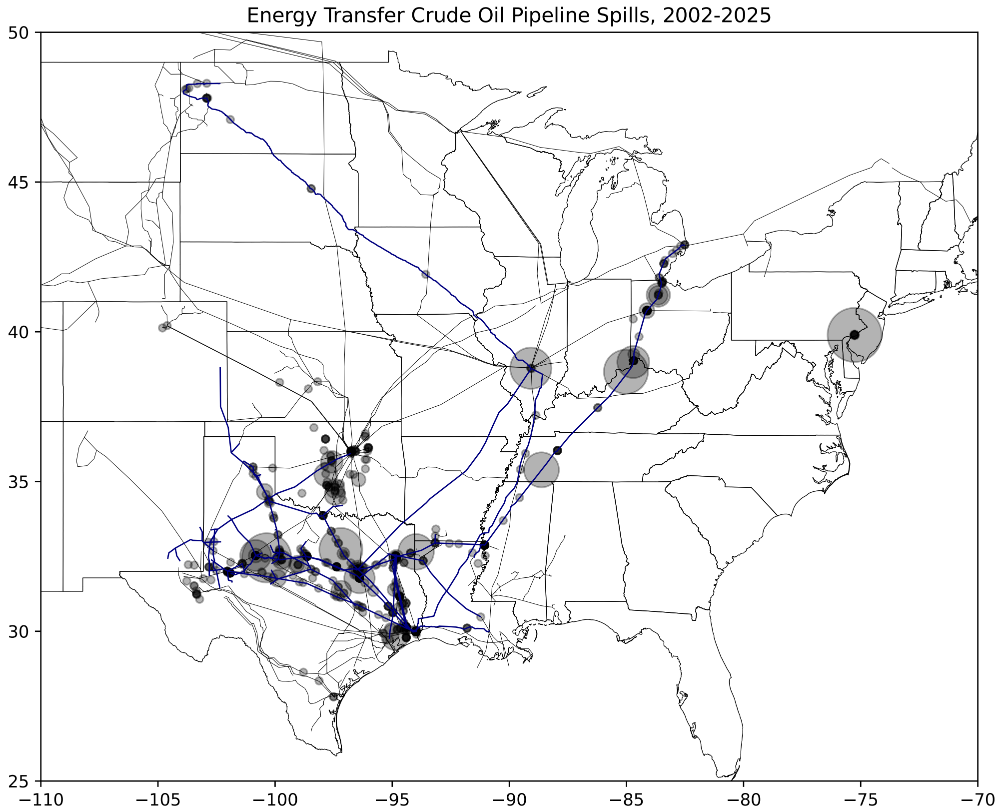


Figure 1: The location and volume of crude oil spills reported to PHMSA from Energy Transfer's pipeline network, 2002-2025. See Appendix for mapping details.

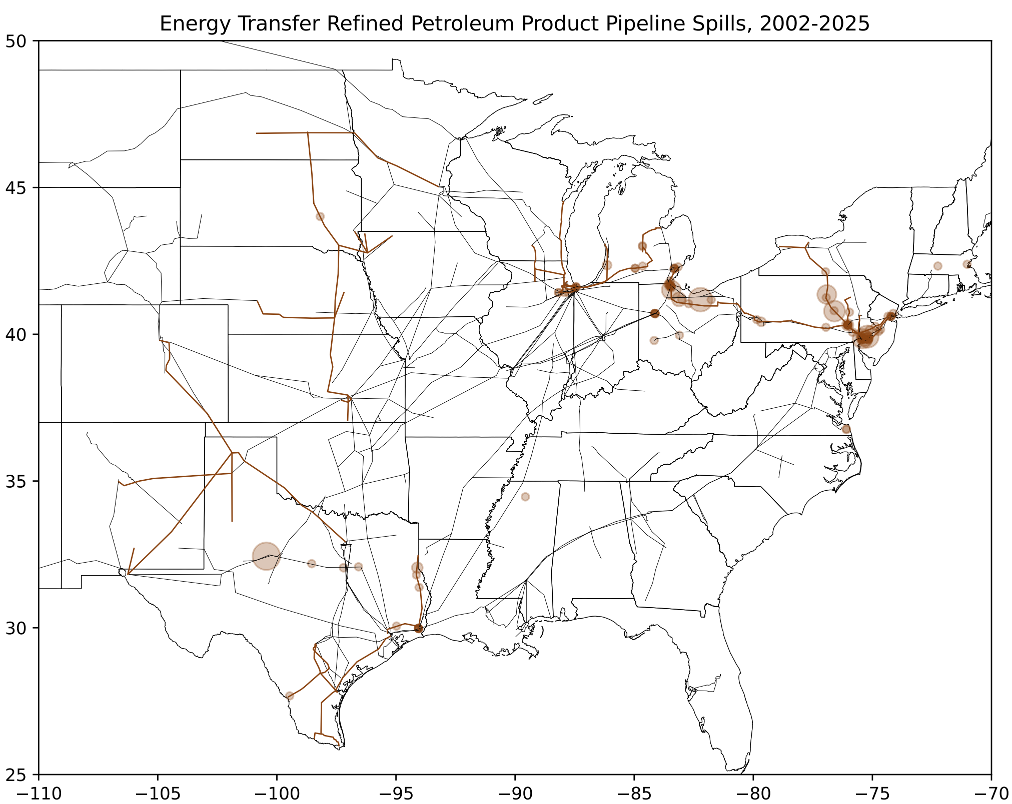


Figure 2: The location and volume of refined petroleum product spills reported to PHMSA from Energy Transfer's pipeline network, 2002-2025. See Appendix for mapping details.

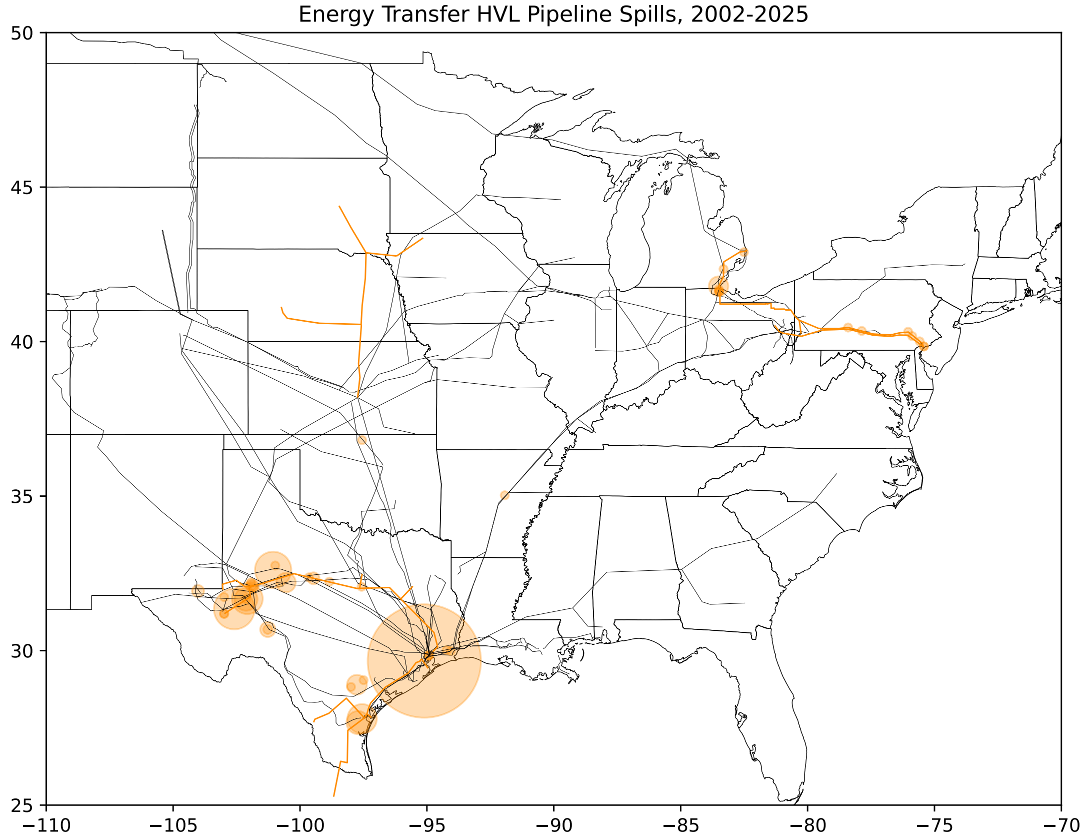


Figure 3: The location and volume of HVL spills reported to PHMSA from Energy Transfer's pipeline network, 2002-2025. See Appendix for mapping details.

Natural Gas Releases

Energy Transfer's subsidiaries and joint ventures also reported 177 incidents on their gas transmission and gathering[81] pipelines from 2010 through June 2025. These incidents saw the unintentional release of 6,802 million cubic feet (MMcf) — as well as the intentional release of 701 MMcf — of natural gas. The events reported to PHMSA in this dataset only represent a small fraction of ET's total reported methane emissions, as we discuss below.[82]

The natural gas release volumes discussed here and elsewhere in this report are estimated by the pipeline operator and submitted to PHMSA as part of the incident report. The volumes discussed in the report are unintentional spill volumes, and do not include volumes released intentionally, unless otherwise noted. Of the 177 incident report records, 165 have been designated as "final" by the operator. See the Appendix for more discussion of the data and a link to the full dataset used for this analysis.

By far the largest of these incidents are three massive releases from the offshore Sea Robin Gas Pipeline[83] in the Gulf of Mexico — two in January 2025 and a third in May 2025 all in very close proximity to each other.[84] The incident reports note that on January 13 a third party reported observing "bubbles" in the area, and an overflight confirmed bubbles in two locations. The pipeline was isolated the same day, but poor weather and "DSV availability" meant that the repair contractor did not deploy until May 11. Repairs were made and the pipeline returned to service on May 14. However, on May 17, a third party once again reported bubbles which were confirmed by overflight. This time the pipeline was returned to service on May 24.

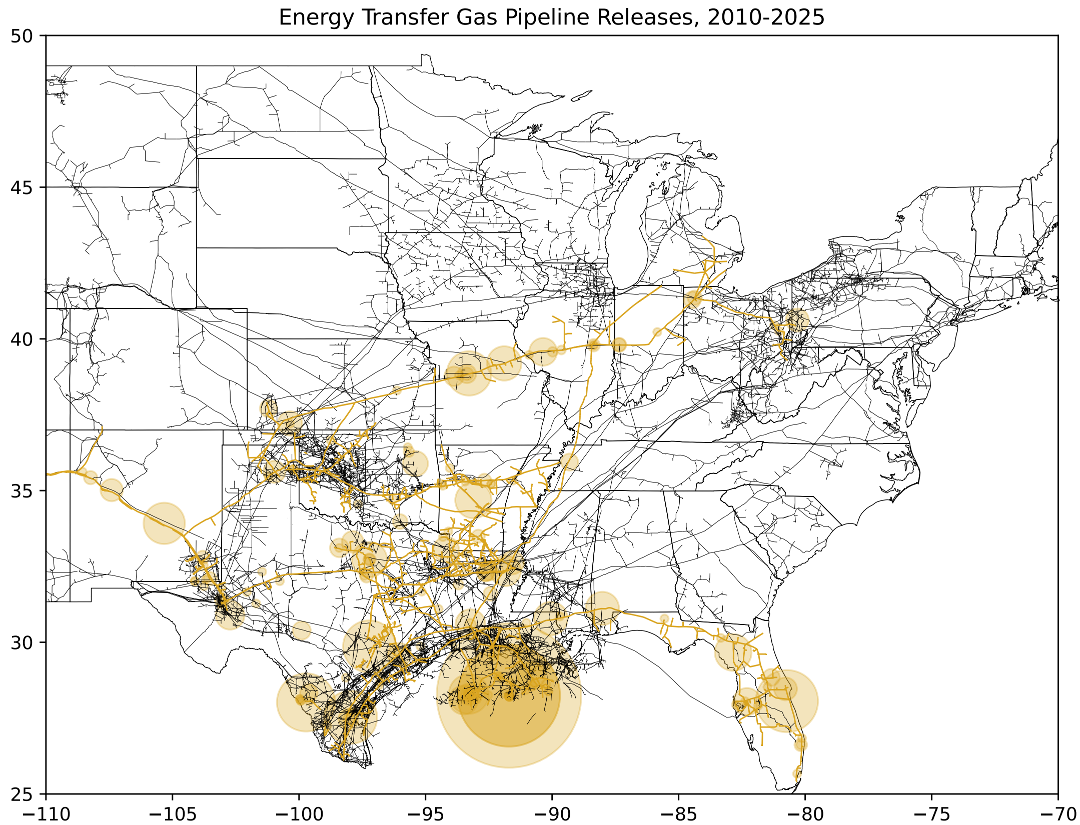


Figure 4: The location and volume of natural gas releases reported to PHMSA from Energy Transfer's pipeline network, 2010-2025. See Appendix for mapping details.

The two January leaks released a combined 1,587 MMcf of gas, and the May incident released the same amount (likely the total volume contained in the isolated pipeline segment).[85] Together these three incidents make up almost half the volume of Energy Transfer's total releases from 2010 to present. The May incident is the second largest natural gas release reported to PHMSA since 2010, while the two January incidents are ranked #4 and #5. In the years leading up to these releases, the Sea Robin pipeline had reported to PHMSA a number of smaller releases.[86]

Other notable Energy Transfer gas pipelines incidents include:

- In December 2012, a rupture on the Florida Gas Transmission (FGT) pipeline near Melbourne, FL "resulted in the ejection of an approximately 20-ft section of 20-inch pipe which landed on the multi-pipeline right-of-way (ROW) approximately 15-feet from the failure location."[87] An estimated 294 MMcf of gas was released.[88] The FGT pipeline has also seen two incidents lead to fires, in June 2013 near Franklinton, LA and in September 2020 near Sanford, FL.[89] The latter incident reportedly caused the evacuation of 20 people.[90] In January 2023, a FGT compressor station near Trenton, FL vented approximately 103 MMcf of natural gas.[91]

- In January 2024, there was a fire at a compressor station near Laredo, TX. A reported 257 MMcf of gas was lost.[92]

- In October 2018, there was a fire and explosion on the King Ranch[93] near Kingsville, TX. The King Ranch gas plant had reportedly been the site of a previous fire in July 2016.[94] PHMSA data shows an estimated 214 MMcf and 30 MMcf of gas was lost in the two incidents.[95]

- In July 2010, a pipeline rupture near Sealy, TX led to the release of 208 MMcf of gas.[96] The rupture led to local evacuations and a shelter-in-place order. One resident commented, "**My ears are still ringing. It looked like an atomic bomb went off**."[97]

- In November 2013, the Panhandle Eastern Pipeline ruptured and caught fire near Hughesville, MO. The fire was reportedly visible 12 miles away,[98] and a reported 150 MMcf of gas was lost. The Panhandle Eastern exploded again in March 2019 near Mexico, MO. A family whose under-construction house was destroyed said "**We do know this with near certainty — had we been living in our new home, we would no longer be alive**."[99] The same pipeline[100] also saw fires in September 2014 in Elwood, IN,[101] October 2014 in Centerview, MO,[102] and October 2022 in Waverly, IL.[103]

- In February 2015, 130 MMcf of natural gas was released when a blowdown valve was "opened unintentionally" near Corona, NM.[104]

- In December 2021, an overflight noticed a "sheen"[105] on the ocean surface near the offshore Stingray Pipeline.[106] An estimated 120 MMcf of gas was released in the incident. The Stingray Pipeline was also reportedly the source of a 445 gallon condensate spill in June 2021.[107] Another sheen and large gas release from the Stingray pipeline occurred in February 2022.[108]

- In October 2023, an ET pipeline caught fire near Jessieville, AR.[109] An estimated 100 MMcf was lost.[110]

- In July 2022, there was a fire on the Old Ocean Pipeline in Ford Bend County, TX.[111] A reported 41 MMcf of gas was lost.[112]

- On September 10, 2018 an explosion occurred in Beaver County, PA at the Revolution pipeline after Energy Transfer subsidiary ETC Northeast Pipeline failed to follow safety and environmental protocols and ensure that proper erosion control devices were installed and maintained.[113] According to the Pennsylvania Attorney General, the failure contributed to two landslides, the second of which separated a section of the pipeline and caused an explosion when gas escaped.[114] That explosion in turn caused "a conflagration that: burned 2 to 4 acres of trees; destroyed a single-family home, a barn, and numerous vehicles; resulted in the evacuation of the residents living nearby; and caused six high voltage electric transmission towers to collapse."[115] ETC Northeast Pipeline was later convicted on nine criminal charges (discussed in more detail in box on p. 25).[116]

- In a recent article, residents of Catarina, TX described the impacts of a March 27, 2025 incident on an Energy Transfer gas pipeline that ET reported released an estimated 23 MMcf of gas.[117] One local resident stated that the gas release shook their house and that he and his wife evacuated, reportedly fearing for their safety. The following day, he reportedly noticed new gas flares "presumably lit to release pressure in the pipeline network by burning excess gas." He described the scene saying "**Have you ever seen 'Lord of the Rings'? Do you remember the Fire of Mordor? [...] That's what we have here**."[118]

Of the reported gas releases, one fatality occurred in 2020 when a worker was struck by a pipeline pig during maintenance,[119] and two events reported injuries involving three people.[120] Fires and explosions were a significant concern, with ignition reported in 26 events and eight escalating to explosions.[121]

The gas releases caused a total of at least $101 million in property damage since 2010, according to the incident reports submitted to PHMSA. Common causes of gas releases included equipment failure (54 events), corrosion (52 events), and material failure of pipe or weld (18 events).[122]

CLIMATE IMPACTS

As climate change impacts continue to mount, political pressure has grown to hold oil and gas companies accountable for climate damages. Often the focus of these efforts has been on large upstream or integrated oil and gas companies, but pipeline companies such as Energy Transfer also play a critical role in the industry, and have begun to be named in climate liability lawsuits.

For example, in 2020 the city and county of Honolulu sued oil and gas companies, including Energy Transfer's key subsidiary Sunoco, for a range of climate damages impacting the city that they maintain resulted from' a "campaign of deception" by the companies[123] A similar lawsuit was filed by the state of Vermont in 2021 and names several Energy Transfer and Sunoco entities.[124]

Sunoco, which was known as Sun Company or Sun Oil Company for much of its history,[125] was closely involved in the American Petroleum Institute (API), an oil industry organization that was aware of climate change as early as the 1950s. In 1959, the president of Sun Oil, Robert Dunlop, addressed a symposium entitled *Energy and Man* organized by API. The physicist Edward Teller also spoke at that symposium and gave a warning to the assembled industry heads that continued oil use will lead to rising temperatures and melting icecaps.[126] By 1967, Dunlop had become the chairman of API and testified before Congress in opposition to research funding for electric vehicles.[127] In the late 1970s and early 1980s, Sun Oil Company was a member of the API's CO_2 Task Force, which reviewed the latest research into climate change and its impacts.[128]

In this section, we examine information on greenhouse gas emissions from Energy Transfer and its subsidiaries.

Reported Scope 1 Emissions

Under the U.S. EPA's Greenhouse Gas Reporting Program (GHGRP), Energy Transfer is required to report Scope 1 emissions for all covered facilities, as well as Scope 3 emissions for some of its fractionators and gas plants.[129] Scope 1 emissions are direct emissions from a facility that is owned or controlled by a company while Scope 3 emissions are emissions in a company's value chain that are not directly controlled by it. ET also publishes an ESG reporting template, but many of the fields in the emissions section (apart from EPA reporting) are left blank.[130] The form states that as of September 2025 ET did not have a greenhouse gas emissions reduction target.[131]

In other publications, ET does highlight various initiatives and technologies to reduce emissions, including carbon capture, dual-drive technologies, low-emission pneumatic devices, thermal oxidizers, and the use of optimal gas imaging (OGI) to detect and reduce emissions.[132] In 2021, ET announced the creation of an Alternative Energy Group within the company.[133]

For 2022, Energy Transfer reported emissions of 17.3 million metric tons of CO_2-equivalent (Mt CO_2e) across all its subsidiaries. ET's reported emissions rose to 19.4 Mt CO_2e in 2023. Of that total, 4.1 million metric tons of CO_2e were from methane emissions (representing 164,000 metric tons of methane, assuming a global warming potential of 25).[134] Figure 5 shows recent trends in ET's emissions reported to the GHGRP. The map below shows the location of and size of the emitting facilities that ET reported to GHGRP in 2023 (see Appendix for details).

In September 2025, U.S. EPA Administrator Lee Zeldin announced a proposed rule to end the Greenhouse Gas Reporting Program, which had been tracking U.S. emissions for 15 years.[135] The only exception to this rollback involves reporting for petroleum and natural gas systems (subpart W), which had been required under the Inflation Reduction Act and which were delayed by Congress until 2034.[136]

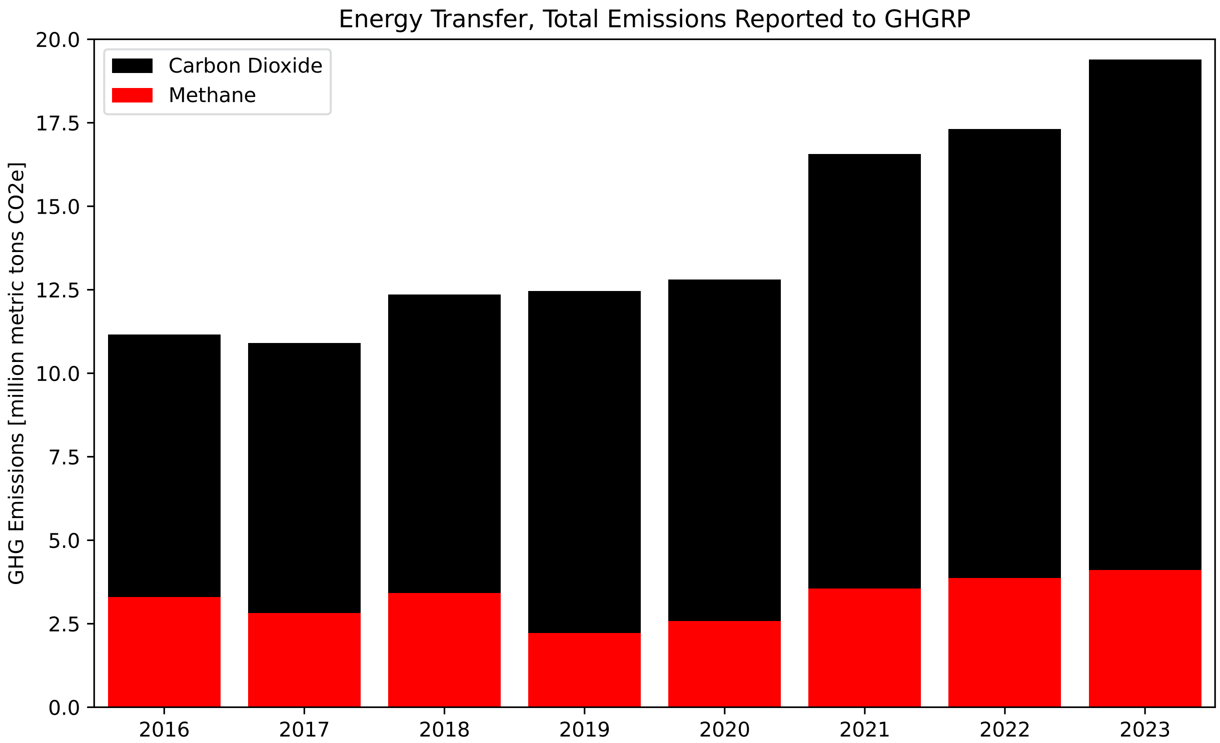


Figure 5: Total greenhouse gas emissions reported to the U.S. EPA GHGRP across Energy Transfer's subsidiaries.

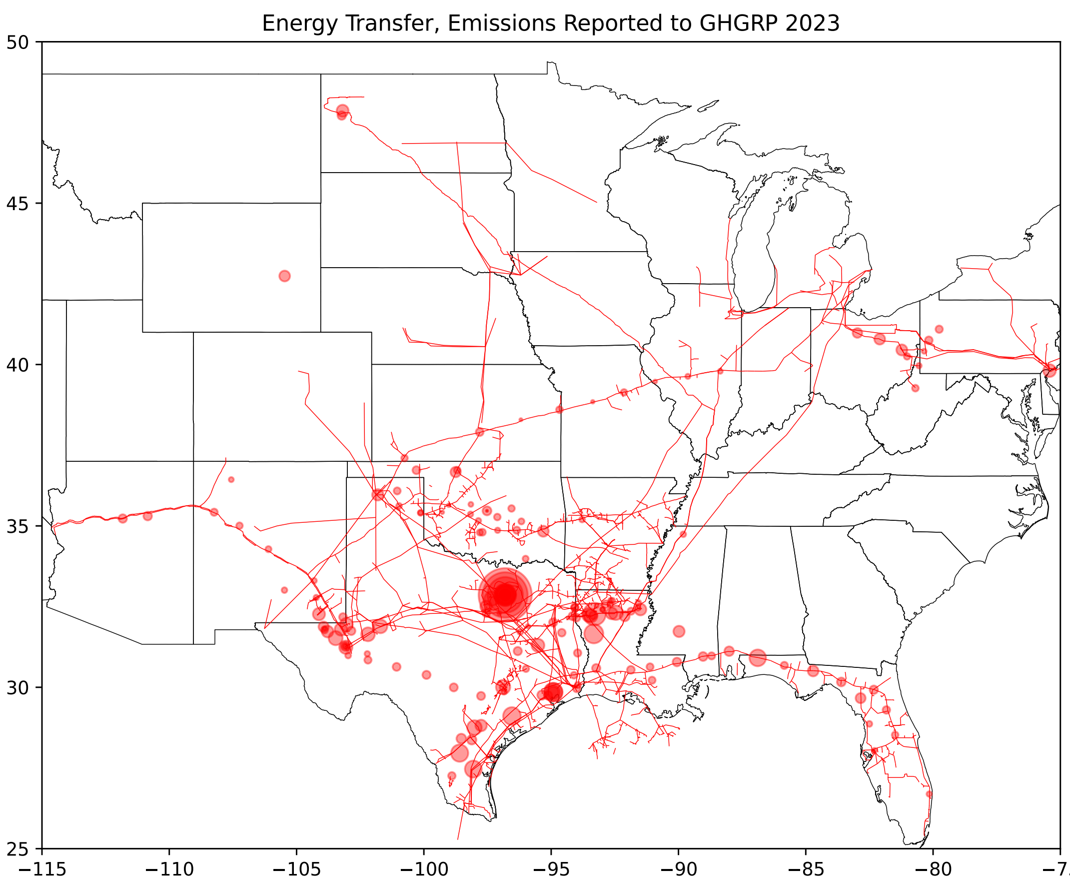


Figure 6: Reported location and scale of greenhouse gas emissions reported to the U.S. EPA GHGRP in 2023 across Energy Transfer's subsidiaries.

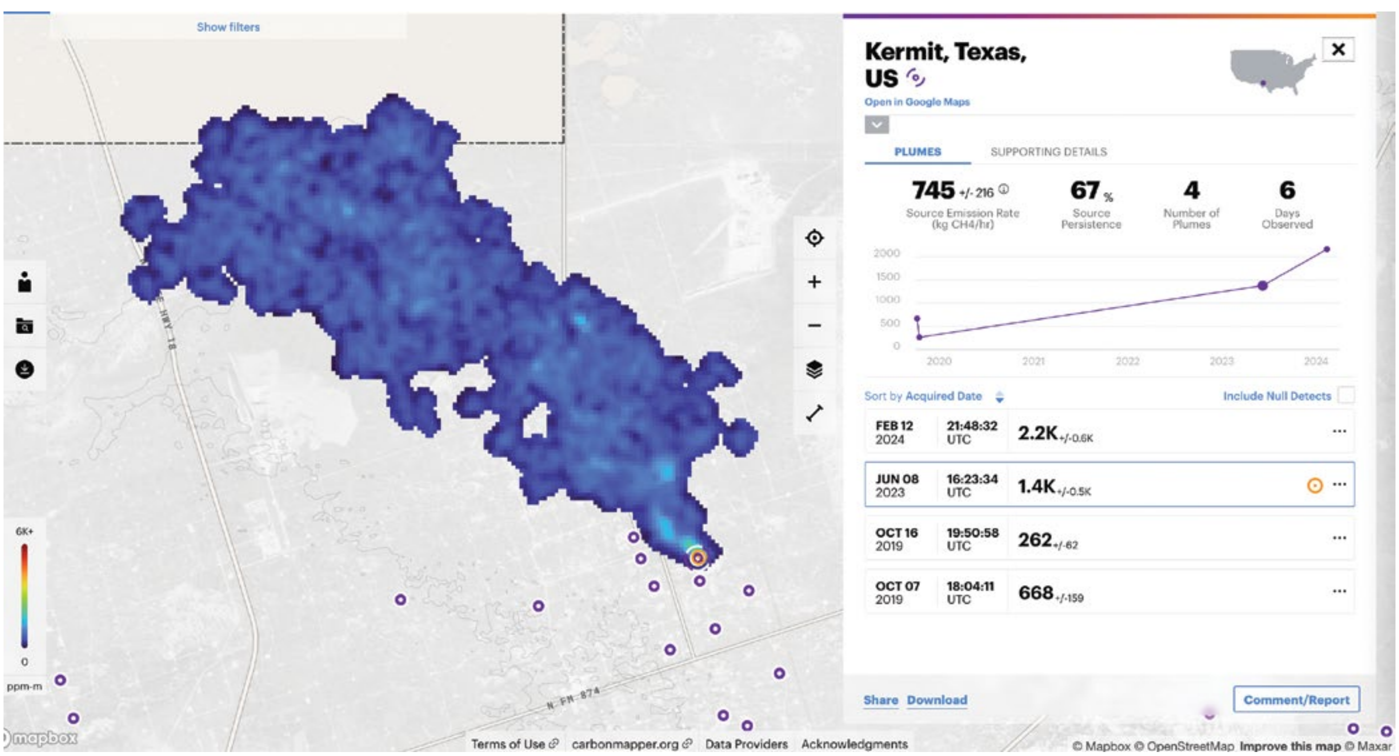
OGI and Satellite Observations

Despite this reporting, it is widely accepted that EPA's GHGRP data understates the problem of methane emissions from the oil and gas sector,[137] with the discrepancy largely due to a lack of accounting for so-called "super-emitters."[138] Research by the Environmental Defense Fund (EDF) finds that U.S. gas gathering and transmission pipelines may be leaking between 0.5 and 1.9 million metric tons of methane per year — or roughly 4 to 15 times larger than EPA estimates.[139] It is not clear the extent to which ET's reporting understates its true emissions (if at all), but according to satellite, flyover, and on-the-ground observations, ET facilities have experienced significant methane emissions events over many years — particularly from their operations in the Permian Basin in Texas and New Mexico.

The growing number of satellite-based instruments and public data portals have greatly increased transparency into oil and gas sector emissions in recent years, although significant data gaps remain. For example, Carbon Mapper provides data on four emissions events from ET's Keystone Gas Plant, including quantification of the rate of methane emissions.[140]

Bloomberg has reported on observations of large emission events from oil and gas facilities, often finding that both operators and regulators are unaware of emissions detected by satellites.[141] In 2021, Bloomberg reported on EDF aerial observations of an ET facility in the Permian Basin. One observed leak was estimated at "more than a ton per hour, with a short-term impact on the atmosphere equivalent to about 47,000 idling cars." Of those observations, ET ranked second on a list of repeat emitters in the Permian with 11 persistent locations.[142]

The U.S. EPA investigated a massive methane leak that resulted from an "intentional emergency shutdown" on the FGT in May 2020.[143] Bloomberg also reported on observed emissions due to "routine work" on ET's Panhandle Eastern natural gas pipeline in August 2021,[144] a "blowdown"[145] event from ET's pipeline in Missouri in September 2021,[146] and a "planned release" from the Florida Gas Transmission pipeline in February 2022.[147]



Carbon Mapper data portal showing observations of four plumes from Energy Transfer's Keystone Gas Plant located in Kermit, TX. (Credit: Carbon Mapper).

Energy Transfer's Big Cowboy Pipeline after a 2022 "line break." (Credit: Bloomberg, photo obtained through a public information request with the Texas Railroad Commission)

On March 17, 2022, a "line break" was reported on the Big Cowboy Pipeline in Texas, which is operated by ET through ETC Texas Pipeline Ltd. The emissions event, which lasted "little more than an hour," was estimated to release 900 tons of methane, the short-term climate impact of which is equivalent to the annual emissions of 16,000 cars. Satellite observations of the event were called "the most severe in the U.S. in a year."[148] Further investigation found that the line break was due to a 67-foot long rupture in the gathering pipeline.[149]

In June 2022, ET announced that they had selected satellite technology company Orbital Sidekick "to monitor its Permian Basin assets as part of its Partnership-wide pipeline integrity programs."[150]

In July 2022, a large release from a ruptured ET pipeline in Louisiana[151] led to short-term climate impacts that were reportedly equivalent to the annual emissions from 2,600 cars.[152]

A review of satellite observations in the Permian found that four companies and their subsidiaries were "likely responsible for the majority of methane releases with estimated emissions rates of 100 kilograms an hour or more" over a nine month period in 2023-24.[153] Of these four, Energy Transfer ranked #3 with 15 such events. The #1 ranked emitter was West Texas Gas (WTG) with 105 events; ET completed its acquisition of WTG Midstream on July 15, 2024.[154]

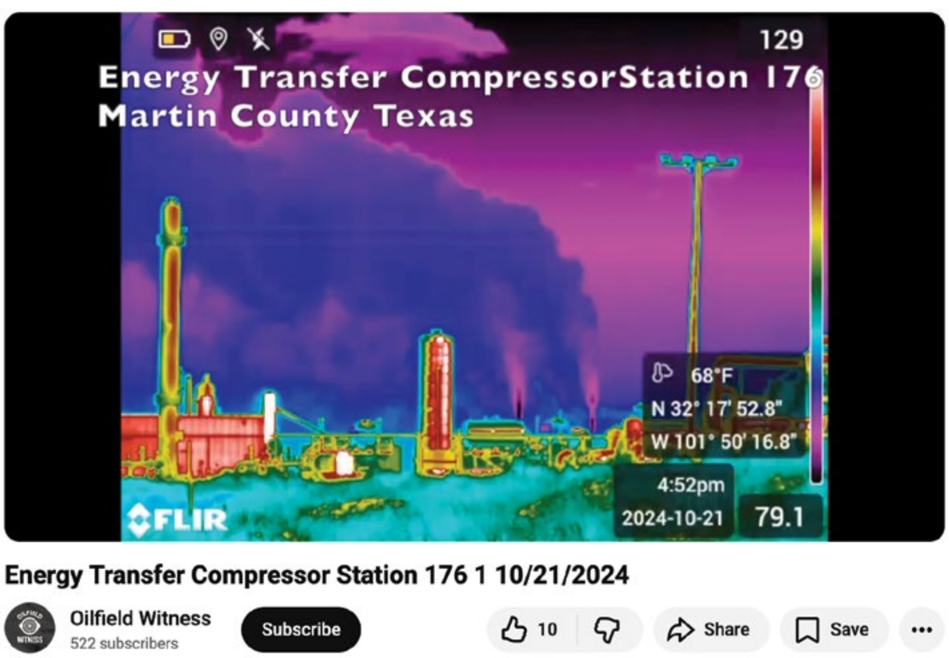
In an analysis of how growing volumes of satellite data have not always led to rapid or effective emissions mitigation, Bloomberg reported on 11 observations of large methane emissions from ET's Dominator Compressor Station in southern New Mexico in 2023-24. It was unclear whether federal or state regulators took any actions, and ET claimed the releases were "within our permitted allowable emissions."[155]

Groups such as Oilfield Witness and Earthworks have long used ground-based optical gas imaging (OGI) cameras to document emissions from oil and gas infrastructure in Texas and elsewhere. While videos from OGI cameras do not quantify the amount of methane emitted without additional analysis, they provide a valuable complement to other sources of information about methane emissions.

Emissions from some Energy Transfer facilities have been documented numerous times over many years.[156] For example, Oilfield Witness documented an apparent "blowdown" at Energy Transfer's Waha Gas Plant on March 14, 2024.[157] Emissions from a compressor station owned by WTG (and therefore acquired by ET in July 2024) were reportedly detected by satellite "more than 30" times from December 2022 to January 2025."[158] OGI video from October 2024 (after the acquisition) reportedly showed continuing emissions at the site.[159]

During one trip in October 2024, Oilfield Witness documented an apparent unlit flare and a "purge" at the Keystone Gas Plant, as well as apparent blowdowns at Compressor Station 176[160] and the Mims Compressor Station.[161] The first two events have seemingly not been reported to TCEQ's air emission events database. The Mims event was reported to TCEQ and apparently lasted for 295 hours and 3 minutes, with reported levels of air pollutants far in excess of emissions limits.[162]

The Biden administration proposed and finalized several regulations to reduce methane emissions,[163] and the Inflation Reduction Act imposed a fee on methane emissions.[164] However, Trump's "One Big Beautiful Bill" delayed the methane fee for 10 years,[165] and Congress directly revoked the regulation implementing the fee via the Congressional Review Act.[166] In July 2025, the EPA announced that it was delaying the requirement that oil and gas companies comply with the 2024 methane standards by up to 18 months.[167] Just days before Trump took office, PHMSA finalized a Gas Pipeline Leak Detection and Repair rule,[168] which Energy Transfer had opposed in a submitted comment.[169] The PHMSA rule was not published in the Federal Register before Trump issued a regulatory freeze, thereby preventing it from being implemented.[170] A bill to codify the rule has been introduced in Congress.[171]



Screenshot from an Optical Gas Imaging (OGI) camera video of emissions from an Energy Transfer compressor station in Martin County TX (Credit: Oilfield Witness)

Scope 3 and Lifecycle Emissions

For most oil and gas producers, their Scope 1 emissions are dwarfed by the emissions resulting from the end-use of the product, which is considered Scope 3.[172] The situation is more complex for pipeline companies, which transport oil and gas that they may or may not own. Energy Transfer does not voluntarily report their full Scope 3 emissions, and in 2022 they submitted comments opposing a proposed SEC climate disclosure rule that would have required Scope 3 reporting.[173] (The SEC rule finalized in March 2024 dropped the proposed Scope 3 requirements, and in February 2025 the Trump administration moved to suspend the entire rule.[174])

In those comments, ET pointed to a lack of consensus around standards for calculating Scope 3 emissions, and stated their view that "the upstream emissions from production and downstream emissions from the ultimate combustive use of any such products we transport without owning are **not** part of our Scope 3 emissions."

However, this view is disputed. The environmental disclosure organization CDP states that "Companies which handle oil and gas products but do not own the products themselves should calculate their Scope 3 category 11 emissions based on the throughput of these products through their operations."[175] The Science Based Targets Initiative (SBTi) has also issued guidance that "Companies that sell, transmit, or distribute natural gas (or other fossil fuel products) shall set separate emission reduction targets for scope 3 category 11 'use of sold products' - covering emissions from the combustion of the sold, transmitted, or distributed fossil fuels."[176] Even if not captured by typical carbon accounting, building new pipelines (or other oil and gas infrastructure) typically has the consequence of expanding oil and gas production, and therefore increasing global emissions.[177]

Energy Transfer acknowledges that they transport a significant fraction of U.S. oil and gas production. In 2023, ET transported 5.3 million barrels of crude oil per day and 31,295 BBtu of natural gas per day (about 11,000 billion cubic feet per year) through their network.[178] While not a full and complete Scope 3 analysis, a simple estimate of the carbon content of those transported volumes amounts to approximately 830 million metric tons of CO_2 (from crude oil) and 600 million metric tons of CO_2 (from natural gas) — the total emissions of which are >70 times larger than ET's reported Scope 1 emissions (see Appendix for calculations).

According to the incomplete Scope 3 reporting provided to the GHGRP, seven ET facilities (all natural gas liquids fractionators) reported emissions totaling 84.0 Mt CO_2e in 2023 due to "supply of products that result in GHG emissions when released, combusted, or oxidized."[179]

Finally, Energy Transfer is developing two export projects with large potential emissions — Lake Charles LNG and the Blue Marlin Offshore Port. Lake Charles LNG has a proposed liquefaction capacity of 2.27 Bcf/d, which the Sierra Club estimates has a total lifecycle emissions of 116 Mt CO_2e per year — or the emissions equivalent of 31 coal plants.[180] Blue Marlin is a deepwater crude export terminal proposed for construction in the Gulf of Mexico, which Global Energy Monitor estimates will lead to emissions of 6.6 billion metric tons of CO_2e during its 30 year lifespan.[181]

AIR POLLUTION AND HEALTH

In addition to impacts from pipeline spills and greenhouse gas emissions, each phase of the oil and gas lifecycle can emit health-damaging air pollution. These emissions can include hazardous air pollutants (e.g. benzene, toluene, ethylbenzene, and xylenes, or BTEX) associated with hydrocarbon production, transport and processing, as well as criteria air pollutants (e.g. PM2.5, NOx, SO2, etc.) created when oil and gas is combusted.[182] These emissions can occur during normal operations, and can be much higher during emergencies, such as the Justice pipeline explosion.[183] A recent study estimated that in the U.S. 91,000 premature deaths, over 10,000 preterm births, over 200,000 childhood-onset asthma incidences and 1,610 lifetime cancers are attributed to air pollutants along the oil and gas industry lifecycle.[184]

There is no comprehensive, nationwide, annual inventory of air pollution emissions. The U.S. EPA periodically publishes its National Emissions Inventory, the most recent full release of which covers the year 2020.[185] The ESG reporting template that Energy Transfer has made public includes fields for total emissions of air pollutants such as NOx, SOx or VOCs, but those fields are left blank.

The enforcement of the Clean Air Act is often carried out by state environmental agencies, some of which maintain statewide emissions inventories. The Texas Commission on Environmental Quality (TCEQ) publishes a point source emissions inventory which covers more than 1,800 facilities.[186] Energy Transfer has a large footprint in Texas and we found 90 facilities operated by 17 separate Energy Transfer subsidiaries or entities in the TCEQ data. Collectively these 90 facilities reported 6,552 tons of NOx, 2,653 tons of VOCs, 1,341 tons of SO2, and 320 tons of PM2.5 in 2022.

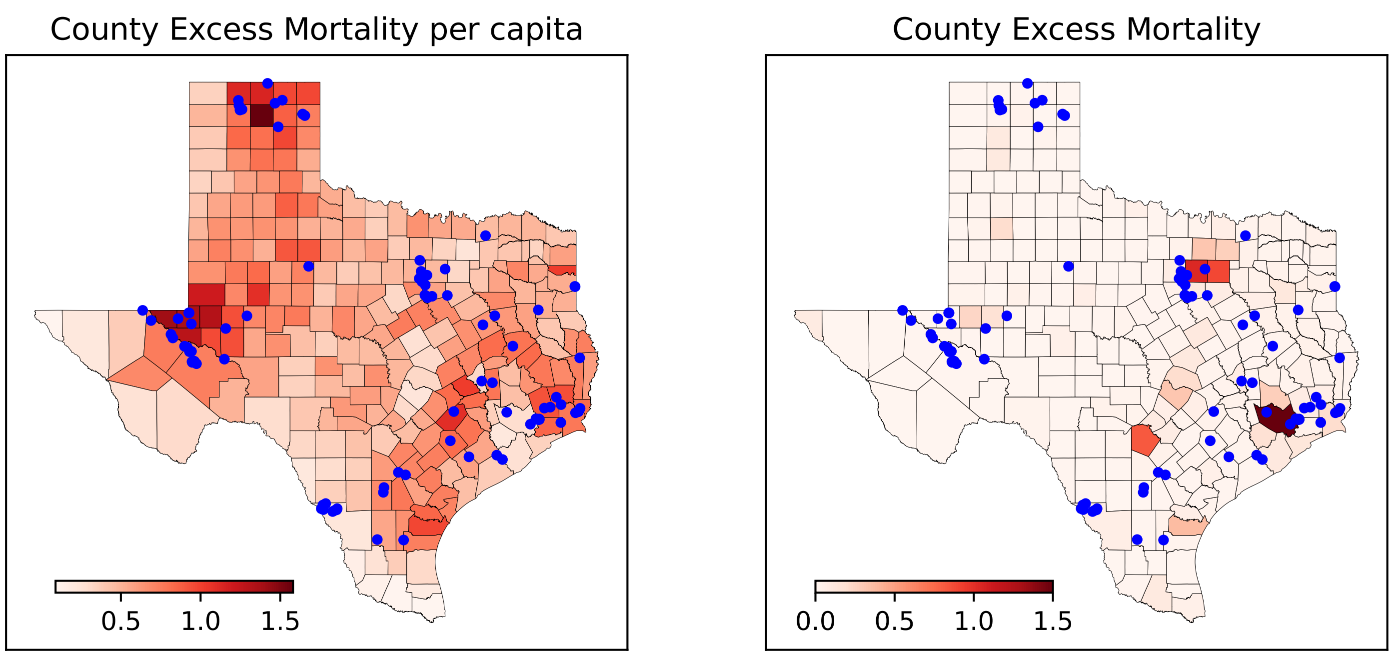


Figure 7: Map of COBRA estimates of excess premature mortality associated with air pollution from 90 Energy Transfer facilities in Texas (blue dots). The left panel shows COBRA-estimated premature mortality (high estimate) per million residents for Texas counties. The right panel shows total COBRA-estimated premature mortality (high estimate) for Texas counties.

Sections of steel pipe lie in a staging area for part of the ETP-Sunoco Mariner East 2 pipeline in the Marchwood neighborhood of Exton, Pennsylvania in June 2019. (Credit: William Meyer)

We used EPA's COBRA tool to estimate health impacts from this subset of Energy Transfer's Texas-based facilities. Applying the COBRA tool, a single year of air pollution from these Texas facilities is associated with an estimated 16 to 22 premature deaths, and is associated with an estimated $269 to $357 million in health-related costs. By this analysis, the facilities with the largest estimated health impact are the King Ranch, Lagrange, and Keystone gas plants. As Figure 7 shows, the highest per capita mortality impacts, as estimated by the COBRA model, are near clusters of polluting facilities, but the highest estimated total impact is seen in counties containing Texas's largest cities. (See Appendix for details on this analysis).

Energy Transfer has also proposed several projects with large potential air emissions. Information on future emissions can be estimated from air permits and other sources. For example, a recent analysis of the permitted air pollution impacts of LNG terminals found that ET's Lake Charles LNG project, if built, could lead to 2.5 to 4 premature deaths and $40-$60 million in health-related costs per year.[187] Despite these potential local and regional health impacts, Louisiana has granted the project a 10 year exemption from local property taxes valued at $1.9 billion.[188]

ET is also proposing to build an ethane cracker at its terminal in Nederland, TX. Their initial air permit application indicated the facility could emit over 5 million tons of carbon dioxide and more than 8,500 tons of dangerous air pollutants per year, but TCEQ reportedly asked ET to revise its air quality analysis to meet stricter standards set in early 2024.[189] This project has reportedly also received substantial local tax breaks.[190]

VIOLATIONS AND PENALTIES

Energy Transfer and its subsidiaries are subject to local, state, and federal regulations to ensure their operations are safe for workers and local residents, and to prevent environmental impacts beyond what is permitted by law. Numerous agencies are responsible for permitting and enforcing these regulations, and when the company's operations violate these rules it may face civil or criminal financial penalties. The company may also be ordered to take some action, such as investing in equipment upgrades, remediating polluted land or water, funding programs or services for local residents, or providing improved operating plans to a government agency.

We collected data from a range of sources about enforcement actions against Energy Transfer and its subsidiaries. For the results presented in this report, we largely focused on actions where the penalty imposed was greater than $100,000, which amounts to a conservative view of ET's total history of regulatory and compliance violations. (See the Appendix for details on how this data was compiled.)

From this data, we estimate that ET, Sunoco, and its subsidiaries have been **assessed more than $100 million in penalties and over $440 million in additional compliance costs** over the past few decades. In this section, we look at the major categories of these violations, and provide additional detail on significant incidents. We note that it is difficult to create a comprehensive database of such violations, and even harder to compare ET against its peers in the industry, or across other industries. However, at least one federal regulator, when proposing a large penalty, described ET as having a **"corporate culture that favored speed and construction progress over regulatory compliance."**[191]

PHMSA Violations

The pipeline spills and releases detailed above have often led to enforcement actions by the federal Pipeline and Hazardous Materials Safety Administration (PHMSA). These enforcement actions typically touch on issues of pipeline safety such as infrastructure maintenance, equipment failures, record keeping requirements, and other safety or security issues. Our database of penalties includes 46 PHMSA enforcement cases since 2003 involving Energy Transfer, Sunoco, its subsidiaries or joint ventures. These cases led to final assessed **penalties totaling $5,937,050**. As noted above, the total property damage estimated by ET associated with their liquids spills and gas releases is well over $100 million (which includes damage to ET's own facilities and the cost of the lost product, as well as damages to third parties).

Other Pipeline Violations

In addition to PHMSA enforcement, Energy Transfer's pipeline network is also subject to regulation by other federal, state and local entities. Penalties have been assessed not just for spills and releases from the pipeline itself, but for violations at compressor stations, gas processing plants, cryogenic facilities, and fractionators — and for mishaps and pollution related to pipeline construction.

Violations of the Clean Air Act or the Clean Water Act are sometimes enforced by the U.S. Environmental Protection Agency or the U.S. Department of Justice. Other times those laws are enforced by state agencies such as the Texas Commission on Environmental Quality (TCEQ). State agencies also enforce state environmental and safety laws. Our database of reported penalties by Energy Transfer and its subsidiaries and joint ventures includes penalties imposed by state agencies in Delaware, Louisiana, New Jersey, New Mexico, Ohio, Oklahoma, Pennsylvania, Texas and others. FERC also regulates certain aspects of pipeline construction and operation.

Non-PHMSA pipeline violations have led to **over $60 million in penalties** for Energy Transfer, Sunoco, and its subsidiaries and joint ventures. Over $50 million of that total comes from incidents in Pennsylvania, which are detailed in a box below. This total *doesn't include* another $60 million in penalties (proposed by FERC but not yet finalized) related to the construction of the Rover pipeline in Ohio, which are detailed in a box on p. 28.

The troubled Mid-Valley Pipeline has received several significant penalties relating to pipeline spills. In August 2006, Mid-Valley and Sunoco agreed to pay a $2.57 million penalty for its January 2005 spill into the Kentucky and Ohio Rivers, as well as a $300,000 penalty for a November 2000 spill in Louisiana.[192] An October 2008 spill in Boone County, KY led to a $275,000 penalty announced in 2012.[193] Then in 2019, Sunoco was assessed $5.4 million in penalties after three crude oil spills from the Mid-Valley pipeline were identified in Texas, Louisiana, and Oklahoma in 2013, 2014, and 2015.[194]

A natural gas plant near Jal, New Mexico owned by the ET subsidiary ETC Texas Pipeline, Ltd., was found to have 685 instances of excess emissions in a 20-month period, resulting in the release of 3,131,006 pounds of air pollutants.[195] The case was settled in 2021 with a $1.3 million penalty, and an order to modify the plant to prevent future excess emissions.[196]

TCEQ has imposed penalties on ET facilities in recent years including $175,625 for pollution from the Keystone Gas Plant,[197] and fines of $158,950 and $144,637 for the Mont Belvieu Fractionator.[198] Other notable EPA/DOJ civil penalties include $990,000 for violation of Clean Water Act stemming from a 2012 gasoline discharge near Wellington, Ohio,[199] and $850,000 for violations of the Clean Water Act stemming from a 2009 crude oil spill in Barbers Hill, Texas and a 2011 crude oil spill in Cromwell, Oklahoma.[200]

Criminal Convictions in Pennsylvania

Many of Energy Transfer's most serious incidents took place in Pennsylvania. These include the widespread pattern of violations during the construction of the Mariner East 2 pipeline and the explosion of the Revolution pipeline. These two projects generated significant monetary penalties and ET was convicted of criminal charges related to the two pipelines brought by Pennsylvania Attorney General Josh Shapiro in August 2022.[201]

As discussed above, the September 2018 landslide and explosion of the Revolution pipeline in Beaver County, PA caused significant damage to a nearby home. The Pennsylvania Department of Environmental Protection (DEP) secured an agreement in 2020 for ET to pay civil penalties of $28.6 million and to fund a $2 million environmental project,[202] and an additional $125,000 penalty in 2021.[203] These fines were followed by the criminal conviction on nine counts in 2022.[204] The Pennsylvania Public Utilities Commission separately imposed a civil penalty of $1 million in 2021.[205]

The Mariner East Project was designed to transport NGLs from the Utica and Marcellus shale production areas eastward across Pennsylvania to the Marcus Hook terminal where some are reportedly exported.[206] Construction began on the Mariner East 2 pipeline in 2017 and it was finally completed in 2022 after a reported cavalcade of "inadvertent returns" of drilling mud, reports of contaminated water wells and lakes, sinkholes, impacted streams, stop work orders, millions of dollars in fines, legal challenges, and opposition from local residents.[207]

In February 2018, in response to numerous violations, Pennsylvania DEP and Sunoco Pipeline executed a Consent Order and Agreement requiring the payment of a $12.6 million penalty and that Sunoco provide detailed plans to prevent future violations.[208] But the violations — and the levied penalties — did not stop there. DEP went on to fine Sunoco:

- $355,622 in May 2018 for "unpermitted discharge of drilling fluids to wetlands, wild trout streams, and High-Quality Waters"[209]
- $147,747 in August 2018 for impacts to the "private water supplies of several citizens"[210]
- $319,461 in August 2019[211], $355,636[212] in August 2020, $497,000 in February 2021[213], and $85,666 in August 2021[214] — all for "unauthorized discharges of drilling fluids"

In 2020, Sunoco Pipeline was fined $1.95 million for discharges into Raystown Lake and was required to create a fish habitat rehabilitation plan with a minimum value of $1.15 million.[215] According to the Pennsylvania DEP, Sunoco Pipeline suffered "losses of circulation comprising of 3 million gallons of drilling fluid" during horizontal directional drilling (HDD) near Raystown Lake between April and December 2017, which directly violated the state's Clean Streams Law and Dam Safety and Encroachments Act.[216] Over 208,000 gallons later surfaced as an "inadvertent return" (defined as an "unauthorized discharge of drilling fluids to the ground or surface waters, including wetlands").[217] Sunoco did not immediately report the release of fluids to regulators, which covered about 8 acres of the lake bed.[218]

In December 2021, DEP fined Sunoco for contaminating yet another lake.[219] In August 2020, "drilling fluids and mud were discharged into Ranger Cove in Marsh Creek Lake during Sunoco's pipeline installation." Sunoco was required to dredge the lake and paid a civil penalty of $341,000, as well as $4 million "to restore and improve visitor experiences at the park."[220] And in July 2023, DEP once again fined Sunoco $660,000 for further violations.[221]

In 2021, Pennsylvania charged Energy Transfer with 48 counts of criminal conduct for environmental pollution and "unlawful conduct" during the Mariner East 2 construction.[222] Energy Transfer responded to the criminal charges with a plea of no contest.[223] The plea deal with the state required the company to "pay fines to the Commonwealth, pay for independent evaluations of potential water quality impacts to residential water supplies and compensate any affected homeowners, and to also pay $10 million" to projects that improve the health and safety of water resources along the pipeline routes.[224]

The Attorney General reportedly found that drilling fluid from the construction had "contaminated the drinking water wells of at least 150 households across the state." The AG stated that "**We can't trust these out-of-state companies to police themselves. They have to answer for their crimes**."[225]

The numerous environmental and safety violations during the Mariner East 2 pipeline construction led to the U.S. EPA proposing debarment of the general partner and four subsidiaries, effective as of October 2022. The EPA reasoned that the pollution, environmental damages, safety violations, and unlawful conduct collectively made the companies ineligible for federal government contracts.[226] The debarment proceedings were suddenly lifted by the agency in March 2025, reportedly ending the proposed debarment from federal contracts.[227]

Energy Transfer recently agreed to pay a $15 million settlement in a class action lawsuit.[228] The lawsuit, led by Allegheny County Employees' Retirement System, alleged that the company misled investors about its Mariner East 2 and Revolution pipelines by not disclosing a reported FBI corruption investigation,[229] as well as allegedly concealing serious safety risks and construction problems that jeopardized the pipelines' completion.[230] In the settlement, ET expressly denies "any and all allegations of fault, liability, wrongdoing, or damages whatsoever."[231]

Refineries and Terminals

Energy Transfer currently operates a number of terminals and tank farms that facilitate the transport and storage of oil and gas. Two of the largest are the facilities in Nederland TX (which consists of crude oil storage and NGL export facilities)[232] and Marcus Hook PA (a hub for processing and exporting NGLs).[233] For decades Sunoco operated refineries located in Philadelphia PA , Marcus Hook PA, Toledo OH, Tulsa OK, Eagle Point NJ, and Sarnia, Ontario.

Sunoco largely exited the refining business in 2012,[234] maintaining only partial ownership of the Philadelphia refinery until it was shuttered in 2019 following a massive explosion.[235] Some of the violations discussed here occurred at Sunoco refineries prior to both its 2012 exit from refining and its merger with ET. For violations relating to terminals and refineries, state and federal agencies have issued penalties totaling over $17 million (see Appendix and supplemental data for more information).

In January 2005, a court upheld a $3.5 million civil penalty against Sunoco for failing to install pollution controls on the Marcus Hook refinery.[236] Later that year, the EPA and DOJ announced a settlement related to four Sunoco refineries. Sunoco agreed to pay a $3 million civil penalty, spend $3.9 million on environmentally beneficial projects, and spend approximately $285 million to install pollution controls to reduce NOx and SO2 emissions.[237] The Marcus Hook refinery and associated facilities continued to rack up violations in both Pennsylvania and Delaware. The refinery received over $3.5 million in additional fines from 2005 until the end of refining operations in 2012.[238] Even after the site was converted to a terminal it continued to be regularly cited for violations by Pennsylvania DEP, totaling over $1 million in penalties from 2017 to 2024.[239]

Sunoco's other refineries also saw violations. In 2024, ET was ordered to pay $2 million to restore and clean up chemical contamination of a wetland near the Toledo refinery in Ohio.[240] In 2009, the Eagle Point refinery in New Jersey was fined $1.5 million for failing to comply with emissions standards for benzene.[241] In 2011, the Tulsa refinery in Oklahoma was fined $695,000 for Clean Air Act violations.[242]

Starting in 2012, Sunoco held "an approximately 30% non-operating interest" in Philadelphia Energy Solutions (PES) and retained some remediation liabilities for the refinery site.[243] During this time, PES received civil penalties for air and water violations totaling over $800,000.[244] Following PES's 2018 bankruptcy, ET's interest dropped to 7% and ET had apparently fully ended its equity stake in PES sometime in 2020.[245] In October 2024, the EPA reached a $4.2 million settlement for the June 2019 explosion that reportedly permanently ended refining operations at the site.[246]

ET claims that its Texas-based Nederland Terminal is "the largest, singularly owned above-ground crude oil storage facility in the U.S. and the second largest natural gas liquids (NGLs) export facility in the world."[247] The terminal has also amassed numerous regulatory violations, the largest of which was assessed at $115,725 in 2020 for Clean Air Act violations.[248]

Worker Safety Violations

The U.S. Occupational Safety and Health Administration (OSHA) is the federal agency working to ensure safe and healthful working conditions for a wide range of U.S. workers. Although OSHA does not oversee worker safety at pipeline facilities,[249] OSHA has assessed dozens of penalties totaling nearly $1 million at ET and Sunoco's terminals and refineries.

Starting in 2007, OSHA announced a National Emphasis Program and undertook inspections at multiple refineries, including some owned by Sunoco.[250] In 2009, Sunoco reached a settlement for $270,000 regarding the Toledo refinery[251] and paid a final penalty of $225,000 for violations at the Eagle Point refinery.[252] Also in 2009, Sunoco paid a final penalty of $159,500 for serious and repeat regulatory violations at its Marcus Hook refinery.[253] Later that year, OSHA imposed another $32,000 penalty related to an investigation following an "ethylene complex explosion" also at Marcus Hook.[254]

Despite the existence of safety regulations, an analysis based on data from the Bureau of Labor Statistics suggests that the "on-the-job fatality rate" for pipeline construction workers "has averaged 4.3 times more than the national average."[255] In their most recent Corporate Responsibility report, ET notes that they "achieved record-breaking safety performance in 2024" on OSHA reportables.[256]

Rover Pipeline

The Rover Pipeline is an over 700-mile long pipeline that was built in 2017 to transport gas from the Utica and Marcellus shale production areas in West Virginia, eastern Ohio, and western Pennsylvania westward through Ohio and into Michigan.[257] One August 2017 analysis concluded that the construction of Rover had "racked up more environmental violations than other major interstate natural gas pipelines built in the last two years."[258] The largest of these was a spill of 2 million gallons of drilling fluids while drilling under the Tuscarawas River that reportedly flowed into a nearby wetland and covered it with drilling mud 1 to 2 feet deep in places.[259]

In 2021, FERC proposed a $40 million fine due to safety violations and pollution of protected waters and wetlands in that incident. Specifically, FERC assessed the civil penalty for intentionally adding toxic, unapproved substances to drilling fluid used in horizontal directional drilling (HDD), failure to properly monitor the right-of-way of the HDD operation, and improper disposal of inadvertently released drilling mud that was contaminated with diesel fuel and hydraulic oil.[260] As of November 2024, FERC stated the matter is still "pending before the Commission", and Energy Transfer has stated that they expect the contracting company who conducted the drilling to compensate Energy Transfer for any fines or penalties.[261]

The Ohio EPA also attempted to impose penalties for violations during Rover's construction. After ET reportedly refused to recognize Ohio EPA's enforcement authority or negotiate a settlement,[262] Ohio Attorney General Mike DeWine filed suit in November 2017.[263] The lawsuit sought to recover more than $2 million in penalties and injunctive relief related to permit compliance, however the case was dismissed finding that Ohio EPA had "waived its rights by not approving the company's clean water certificate within a year."[264] Subsequent rounds of appeals have affirmed the dismissal of the charges.[265] In October 2025, the U.S. Supreme Court declined to hear Ohio's appeal,[266] indicating that to date ET appears to have avoided any federal or state penalties for these incidents.

Prior to the proposed penalty for unlawful pollution, FERC proposed another penalty to the tune of $20 million alleging that the company misrepresented their construction plans.[267] A FERC Office of Enforcement Staff Report alleges that Rover Pipeline failed to notify FERC of their intention to purchase and destroy the historic Stoneman House in Ohio, which was located near the planned Rover pipeline route. FERC alleged this misleading act violated the Natural Gas Act, and prevented FERC from appropriately considering the effect of the Rover pipeline on the property in accordance with the National Historic Preservation Act, since the Stoneman House was eligible to be listed in the National Register of Historic Places.[268] As of 2024, a ruling on the $20 million penalty is currently stayed in court.[269]

The company had purchased the historic property in May 2015 for $1.3 million and demolished it a year later.[270] In addition to the proposed penalty from FERC, Rover Pipeline reportedly paid nearly $4 million to Ohio SHPO in the process of resolving "all outstanding issues regarding the Stoneman House."[271]

Aerial view of ETP Bayou Bridge Pipeline Construction in Louisiana in 2018. (Credit: Julie Dermansky, Greenpeace)

MTBE Contamination

Methyl tertiary butyl ether (MTBE) is a chemical that was commonly added to gasoline in the 1980s and 90s, but after concerns arose about potential harm to human health,[272] its domestic usage was phased out in the 2000s.[273] By that time, the additive was reportedly found to have contaminated groundwater in many states, prompting numerous lawsuits.[274] MTBE pollution has reportedly been associated with gasoline service stations, storage tanks, and other oil infrastructure.

Sunoco has entered into settlements regarding MTBE contamination with the Attorneys General of multiple states totaling tens of millions of dollars. The defendants in some of these cases settled while denying liability.

- In 2008, 12 oil companies including Sunoco settled to pay a total $423 million for MTBE contamination of 153 public water systems across the U.S.[275]
- In 2012, Shell and Sunoco settled with the New Hampshire AG for a combined $35 million.[276]
- In 2018, Sunoco paid $64 million to the state of New Jersey to "resolve its liability for MTBE damages."[277]
- In 2019, Sunoco paid $316,667 to settle a lawsuit brought by the AG of Vermont.[278]
- In 2022, Shell, Sunoco, and CITGO settled with the Rhode Island AG for a combined $15 million.[279]

ET reports that as of December 2024, Sunoco defendants are involved in two ongoing lawsuits involving MTBE contamination, brought by the states of Maryland and Pennsylvania.[280] The case brought by Pennsylvania is part of a consolidated multi-district litigation case surrounding claims of contamination in groundwater, including private wells, caused by releases of gasoline containing MTBE.[281]

The Maryland Attorney General named both Energy Transfer and Sunoco and several of their subsidiaries in the complaint filed in December 2017 for "wide spread contamination to the waters of the State" and "wrongful conduct" in the use of MTBEs.[282]

Market Manipulation

Energy Transfer and its subsidiaries have also faced penalties and lawsuits related to alleged manipulation of energy markets.

When Hurricane Rita came ashore in 2005, Energy Transfer was found responsible for taking advantage of the gas supply disruptions that came with it. Reportedly, ET took a short position on wholesale natural gas prices at the Houston Ship Channel and "stockpiled gas to flood the market [in] the days after the storm. They bet on prices going down, and then took action to make sure they did."[283] In March 2008, the Commodity Futures Trading Commission (CFTC) obtained a $10 million penalty for "attempting to manipulate natural gas prices."[284] FERC also investigated the incident and obtained a settlement in September 2009 where ET agreed to pay a "$5 million civil penalty and establish a $25 million fund to disgorge alleged unjust profits to entities that file claims."[285]

In a separate case, Sunoco LP was penalized $450,000 in 2020 by the CFTC over the actions of a former trader who was found to be "spoofing" (or, "bidding or offering with the intent to cancel the bid or offer before execution") futures contracts for crude oil and other commodities.[286]

Although no penalties appear to have come of it, Energy Transfer's actions around the deadly Texas winter storm in 2021 have generated controversy and lawsuits. In the aftermath of the storm, ET reported a massive $2.4 billion increase in earnings that they said was "primarily due to the impacts of Winter Storm Uri."[287] A municipal energy provider in San Antonio, CPS Energy, later sued gas suppliers over alleged market manipulation, including two ET subsidiaries. The suit alleges the area experienced up to 15,000% increases in gas prices during the storm.[288] In response to the charges, Energy Transfer said CPS was "trying to play politics and place blame on others", suggesting that CPS "did not prepare properly" for the storm's severity.[289]

The Eagle Point Refinery in Westville, New Jersey, photographed in 2004 before its demolition. (Credit: David M. Warren/mct/ZUMAPRESS.com)

UPENDING THE REGULATORY SYSTEM

Past research by Greenpeace USA and others has documented Energy Transfer's enormous impact on our political system. Our 2023 report uncovered ET's support for anti-protest legislation and the politicians supporting the spread of such bills in the U.S.[290] Kelcy Warren's close relationship with Donald Trump has been well-documented,[291] as has both men's penchant for SLAPP suits.[292] It is clear that ET stands to benefit from President Trump's agenda — indeed, Warren's wealth reportedly "rose by nearly 10%" following FERC's recent decision to grant an extension for the Lake Charles LNG project.[293]

In this section, we draw more attention to legal moves that ET has taken very recently that have the potential to radically reshape how the federal government regulates their business.

Constitutional Challenge to Pipeline Safety Enforcement

As discussed above, PHMSA regulates pipeline safety through its in-house enforcement system. However, a legal dispute initiated by Energy Transfer in January 2025 could lead to some (or all) such safety regulations being enforced instead through the federal court system with a right to a jury trial.[294] Given the already overtaxed capacity of the courts, such an outcome could raise costs for the public, could lead to far fewer penalties for safety violations, and could spark a dramatic shift towards reduced enforcement of pipeline safety.[295] The ongoing lawsuit is part of a broader conservative attack on the administrative state that has already found success at the U.S. Supreme Court.[296]

In June 2024, the Supreme Court ruled in *Securities and Exchange Commission v. Jarkesy* that the SEC's system of in-house tribunals violated the Seventh Amendment's right to a jury trial.[297] The Fifth Circuit had previously also found that (1) Congress had unconstitutionally delegated power to the SEC by failing to provide it with an 'intelligible principle' to decide between in-house tribunals or federal courts, and (2) that removal protections for SEC administrative law judges violate the Take Care clause.[298] As the Supreme Court did not rule on these other two Fifth Circuit findings, they still hold in the Fifth Circuit (namely Louisiana, Mississippi and Texas).

Many commentators noted that the *Jarkesy* decision would likely have profound consequences for other federal agencies that similarly rely on in-house enforcement systems. In February 2025, the Trump DOJ announced that it had "determined that multiple layers of removal restrictions shielding administrative law judges (ALJs) are unconstitutional."[299]

Energy Transfer submitted an amicus brief in the *Jarkesy* case arguing the SEC's authority was unconstitutional.[300] While that brief did not mention PHMSA, it raised similar legal arguments regarding FERC's in-house enforcement system and cited ET's ongoing legal disputes with FERC over the construction of the Rover Pipeline. Since then, ET has taken up the legal issues raised in the *Jarkesy* cases to challenge enforcement systems in other agencies.

Energy Transfer's subsidiary Panhandle Eastern Pipe Line Company LP filed a lawsuit against PHMSA in the U.S. District Court for the Northern District of Texas in January 2025, arguing that PHMSA's in-house enforcement process is unconstitutional.[301] The allegations follow an incident at Panhandle's Borchers Station in Kansas that led to the tragic death of a fieldman while working with a pipeline pig. PHMSA stepped in to investigate following the incident and alleged that Panhandle failed to follow safety procedures for operating pipeline pigs.[302]

PHMSA proposed a $2.5 million fine for the incident. After Panhandle filed its suit PHMSA dropped its enforcement claim[303] rendering the lawsuit moot, and Panhandle then dropped the case. However, in April 2025 the U.S. Department of Justice filed suit against ET in federal court, taking up the same issues that PHMSA had originally raised. In their July 2025 reply to DOJ's lawsuit, ET reiterates its claim that Congress delegating to PHMSA "unfettered" power to choose between administrative enforcement and litigation was unconstitutional. Referencing the Fifth Circuit's *Jarkesy* finding, ET argues that there must be an "intelligible principle" guiding the choice of forum.[304] In August 2025, the court ordered Panhandle enter mediation with the DOJ to resolve the dispute.[305]

Constitutional Challenge to Labor Rights

A similar lawsuit filed by Energy Transfer has the potential to radically upend decades of labor law. Filed on the same day as the Supreme Court's *Jarkesy* ruling, the suit challenges the constitutionality of the National Labor Relations Board's in-house system for hearing labor disputes.[306] The NLRB is an independent federal agency that oversees U.S. labor law and workers' rights in the private sector. As of the end of 2024, ET reported that 9% of workers across all its subsidiaries were represented by a labor union.[307]

Energy Transfer joins other companies like SpaceX, Starbucks, Trader Joe's, and Amazon in attacking the NLRB, and its lawsuit mirrors the legal tactic first used by SpaceX in 2022.[308] In fact, the SpaceX, Findhelp, and Energy Transfer lawsuits were formally consolidated in October 2024.[309]

Energy Transfer's anti-worker challenge to the NLRB came after another case, filed by the NLRB on behalf of a former employee in 2022. The case represents a former employee of Energy Transfer subsidiary La Grange Acquisition LP who accused the company of violating the National Labor Relations Act.[310] The former fractionator operator alleged La Grange Acquisition retaliated against them after they tried to bring attention to possible safety violations, including "radioactive material and hazardous dust in work areas."[311] La Grange Acquisition and Energy Transfer filed for declaratory and injunctive relief from the case and filed their own, separate suit alleging that the NLRB's structure was unconstitutional due to for-cause firing shields that exist for NLRB board members.

A Trump-appointed district court judge issued a preliminary injunction in July 2024 finding that the NLRB's removal protections are likely unconstitutional, and staying the NLRB case filed by the former La Grange employee while the lawsuit moves forward.[312] The NLRB challenged the injunctions but were denied by Judge Don Willett in August 2025. Judge Willett used the Supreme Court's decision to maintain Trump's termination of NLRB board member Gwynne Wilcox as an argument for the unconstitutionality of removal protections in the NLRB board.[313] The injunction means that the former La Grange employee's allegations will not be heard until Energy Transfer has finished litigating against the NLRB.

The corporate pressure against workers' rights and processes in government comes at a time when the White House and high court seem to similarly disfavor agencies' abilities to protect workers and communities. In January 2025, newly re-elected President Trump fired Biden-appointee Gwynne Wilcox from the NLRB Board, despite statutory removal protections found in the law.[314] In March, the U.S. District Court for the District of Columbia reinstated Wilcox,[315] but in May, the U.S. Supreme Court ultimately ruled in favor of the President's right to fire Wilcox and other agency officials.[316] Three justices dissented on the ruling, calling the decision to favor presidential will over legal precedent and agency independence "nothing short of extraordinary".[317]

In a separate case in May 2025, ET also sued the Occupational Safety and Health Administration (OSHA), alleging that OSHA's in-house whistleblower system similarly violates the Constitution.[318] Energy Transfer also submitted an amicus brief in the *Seven County Infrastructure Coalition* Supreme Court case that in May 2025 significantly limited what impacts federal agencies may consider when conducting a NEPA analysis.[319]

While we do not know how all of these pending legal processes will play out, the Supreme Court's skepticism regarding the legal underpinnings of the administrative state at least opens the door to a radical reworking of pipeline safety, labor rights and other federal enforcement in the U.S.

CONCLUSION: MENDING FENCES

We are in a moment of great uncertainty and peril for the climate, public health, and our democracy.

The Trump administration appears hell-bent on boosting fossil fuels and is dismissive of the pollution harms that come with it. The administration is accomplishing this on multiple fronts, including eliminating clean air and clean water regulations that keep people healthy, directly attacking renewable energy, doing everything in its power to boost oil and gas drilling and coal mining in the U.S., and even degrading and defunding American science. This is a disaster not just for our climate, but for anyone who breathes air into their lungs.

At the same time, Trump is using the power of the federal government — as well as abusive SLAPP suits — to attack, intimidate and silence his critics, and seek revenge against his perceived enemies. This assault threatens to erode the foundations of free speech, robust political debate, and democracy in the U.S.

Once the Trump era passes, there will be a tremendous amount of work to be done at the federal level to put us on a path to climate sanity and to reaffirm the bedrock principle of protecting public health from the threats of pollution. In the meantime, states and local governments, and everyday citizens can take important actions to hold polluters accountable for their pollution. Central to this restoration must be a renewed commitment to free speech and the right to protest.

The need to decarbonize our energy systems presents us with a golden opportunity to reduce the harms to communities from air and water pollution. **We can build an energy system that stabilizes our climate and is a good neighbor to communities across the country.** This transition will be impossible without the experience and expertise found in the workforce of existing fossil fuel companies. Together we can ensure that no worker or community is left behind in the energy transition.

While not a comprehensive list, we offer a few recommendations to address some of the issues raised in this report:

- Pass anti-SLAPP laws on the state and federal level aimed at protecting the rights of individuals to speak truth to power and be free from threats of burdensome lawsuits from corporations.[320]
- Challenge and repeal anti-protest laws, including fossil fuel anti-protest laws that boost penalties for protest-related activities near pipelines and other polluting infrastructure. Challenge the overbroad use of RICO against protesters and their supporters, which dangerously conflates dissent with organized crime.[321]
- Congress and PHMSA should adopt Pipeline Safety Trust's recommendations for improving pipeline safety.[322]
- In the face of court decisions undermining federal regulatory agencies, Congress must renew and clarify the appropriate roles of federal agencies that have a mandate to protect the environment, public health, and workers — including but not limited to PHMSA, FERC, and NLRB.
- Local, state and federal governments should pass laws to make oil, coal, and gas corporations pay their fair share for the damages they cause.[323]

APPENDIX: RESEARCH METHODS

The Appendix provides more details about how the analysis presented in the report was conducted. We are also publishing on GitHub[324] the following datasets:

- All PHMSA-reported hazardous liquids incidents from ET's pipeline network (2018-present)
- All PHMSA-reported gas release incidents from ET's pipeline network (2010-present)
- TCEQ air emissions data and selected COBRA results by facility and by county for 90 facilities in Texas
- Details and sources for the compiled data on ET's violations, penalties, and other enforcement costs

Tracking Changes to ET Corporate Structure

Energy Transfer has a complex corporate structure that has changed significantly over time. The latest 10-K for FY 2024 lists over 400 named subsidiaries and several joint ventures.[325] This makes the compilation and interpretation of past events complicated.

Following the methodology of our 2018 report *Oil and Water*, we include all incidents for Energy Transfer and Sunoco and their subsidiaries in penalties data and data on spills and releases, including prior to their 2012 merger.[326] However, for ET's more recent acquisitions we conservatively exclude incidents that predate the closing of the merger or acquisition in penalties, spill, and release data. Exceptions to this are noted in the text. The choice to include pre-merger incidents for Sunoco entities reflects the fact that the Sunoco merger greatly diversified ET's business into liquids pipelines and represented a key expansion moment for the company.

Hazardous Liquid Pipeline Incidents

We downloaded the PHMSA datafile "Hazardous Liquid Accident Data - January 2010 to present (ZIP)" on 7/22/2025.[327] The most recent incident in the file was reported on 6/30/2025. To supplement our previous analysis, we selected records of hazardous liquids incidents that took place after 1/1/2018, which was the cutoff date for our 2018 *Oil and Water* report.

Pipeline incidents are typically reported to PHMSA by the pipeline operator. We aim to include incidents across all subsidiaries where Energy Transfer is the pipeline operator. We also include incidents from joint ventures where Energy Transfer is not the pipeline operator, but where they hold a greater than 25% interest.

In recent years, Energy Transfer has acquired a number of other midstream operators. The PHMSA Operator ID may not change when a pipeline changes ownership. We therefore review these Operator IDs to ensure that we only include incidents that post-date Energy Transfer's acquisition. To a first approximation, the email address used to report to PHMSA provides information about the pipeline operator across Operator IDs. We therefore first select Operator IDs that reported using an Energy Transfer, Sunoco, or related email address (e.g. energytransfer.com, sunocologistics.com, sunoco.com, wplco.com, plus possible typos). Those records were then reviewed to determine if they meet the criteria for inclusion in the analysis.

This selection identified incidents from the following Operator IDs (post-2018 incidents only). All the entities listed here are found in the list of subsidiaries from Energy Transfer's latest 10-K filing (FY 2024), except where noted.

- 32099, **Energy Transfer Company**, 49 incidents post-2018.
- 18718, **Sunoco Pipeline LP**, 76 incidents. This entity is described in the latest 10-K as "a wholly owned subsidiary of Energy Transfer."

- 39706, **Energy Transfer Nederland Terminal LLC**, 55 incidents (this ID changed its name from Sunoco Partners Marketing & Terminals LP between October 2021 and April 2022).
- 12470, **Mid-Valley Pipeline Co**, 22 incidents.
- 22442, **West Texas Gulf Pipeline Co**, 17 incidents.
- 39596, **Permian Express Partners LLC**, 18 incidents.
- 39205, **DAPL-ETCO Operations Management LLC**, 10 incidents.
- 39462, **Bayou Bridge Pipeline**, 5 incidents.
- 32683, **Inland Corporation**, 4 incidents.
- 22830, **Wolverine Pipeline Co**, 4 incidents. This is a joint venture where Energy Transfer holds a 31% interest but is not the pipeline operator. All incidents were reported from wplco.com email addresses.
- 40283, **Sunoco LLC**, 3 incidents. This entity is described in the latest 10-K as a subsidiary of Sunoco LP, which is in turn described as a consolidated subsidiary of Energy Transfer.
- 39368, **Crestwood Midstream Partners**, 2 incidents.
- 31863, **HFOTCO LLC**, 1 incident.
- 32288, **White Cliffs Pipeline LLC**, 1 incident.
- 39307, **Sunoco Midland Gathering LLC**, 1 incident. This entity was listed as a subsidiary in Energy Transfer's 10-K filings through 2018, but is not listed in the years following.[328] The incident included here dates from May 2018.
- 31454, **Nustar Logistics LP**, 2 incidents. Sunoco completed its acquisition of Nustar on May 3, 2024.[329] There are 18 total post-2018 incidents for this Operator ID, but we only include 2 incidents that post-date the acquisition, and which were reported from a sunoco.com email address.
- 31888, **Centurion Pipeline LP**, 13 incidents. Energy Transfer completed its acquisition of Lotus Midstream, owner of the Centurion Pipeline, on May 2, 2023.[330] There are 48 total post-2018 incidents for this Operator ID of which 15 were reported from an energytransfer.com email address. Of those 15 incidents, two appear to pre-date the completion of the acquisition. Therefore, conservatively, we only include 13 incidents for this operator.
- 31476, **ET Crude Operating LLC**, 12 incidents. Energy Transfer completed its acquisition of SemGroup on December 5, 2019.[331] There are 13 total post-2018 incidents for this Operator ID, but we only include 10 incidents that post-date the acquisition, and which were reported from an energytransfer.com email address.
- 39147, **Enable Gas Gathering LLC**, 3 incidents. Energy Transfer completed its acquisition of Enable Midstream Partners on December 2, 2021.[332] On October 1, 2023 ET announced that this entity would merge with ET Gathering & Processing LLC.[333] There are 5 total post-2018 incidents for this Operator ID, but we only include 3 incidents that post-date the acquisition, and which were reported from an energytransfer.com email address.
- 10012, **Nustar Pipeline Operating Partnership LP**, 2 incidents. Sunoco completed its acquisition of Nustar on May 3, 2024. There are 22 total post-2018 incidents for this Operator ID of which 2 were reported from a sunoco.com email address.

Our 2018 report also included PHMSA data from 2002 to 2009, which was reported in a different format. That report found 214 incidents attributed to ET/Sunoco from 2002-2009 and 313 incidents from 2010-2017, for a total of 527 incidents (of which 10 did not have geographic coordinates). We did not reanalyze the 2002-2009 dataset, however we did review the 2010-2017 data and found the same total number of incidents and spill volumes as previously reported. The appendix of the 2018 report explains the previous analysis in greater detail.[334]

Gas Transmission and Gathering Pipeline Incidents

We downloaded the PHMSA datafile "Gas Transmission & Gathering Incident Data - January 2010 to present (ZIP)" on 7/22/2025.[335] The most recent incident in the file was reported on 5/28/2025.

Pipeline incidents are typically reported to PHMSA by the pipeline operator. We aim to include incidents across all subsidiaries where Energy Transfer is the pipeline operator. We also include incidents from joint ventures where Energy Transfer is not the pipeline operator, but where they hold a greater than 25% interest. We exclude one ET incident (20200126) where the product released was not natural gas, but condensate, and the unintentional and intentional release volume was zero.

This selection identified incidents from the following Operator IDs (post-2010 incidents only). All the entities listed here are found in the list of subsidiaries from Energy Transfer's latest 10-K filing (2024), except where noted.

- 32099, **Energy Transfer Company**, 51 incidents post-2010.
- 18152, **Sea Robin Pipeline Co**, 25 incidents.
- 15105, **Panhandle Eastern Pipeline Co**, 21 incidents.
- 5304, **Florida Gas Transmission Co**, 20 incidents.
- 40069, **Stingray Pipeline Company, LLC**, 12 incidents.
- 19610, **Transwestern Pipeline Company LLC**, 10 incidents.
- 19730, **Trunkline Gas Co**, 8 incidents.
- 39193, **Rover Pipeline, LLC**, 3 incidents.
- 32166, **Semgas, LP**, 1 incident. This entity was listed as a subsidiary in Energy Transfer 10-K filings for 2019, but is not listed in the years following.[336] The incident recorded here dates from January 2020 and was reported from an energytransfer.com email address.
- 32335, **Regency Intrastate Gas LP**, 1 incident.
- 32467, **ETC Tiger Pipeline, LLC**, 1 incident.
- 602, **Enable Gas Transmission, LLC**. 15 incidents. Energy Transfer completed its acquisition of Enable Midstream Partners on December 2, 2021.[337] There are 68 total post-2010 incidents for this Operator ID, of which 15 were reported from an energytransfer.com email address. Of those 15 incidents, one appears to pre-date the completion of the acquisition. Therefore, conservatively, we only include 14 incidents for this operator.
- 26330, **Enable Oklahoma Intrastate Transmission, LLC**. 3 incidents. Energy Transfer completed its acquisition of Enable Midstream Partners on December 2, 2021. There are 25 total post-2010 incidents for this Operator ID, but we only include 3 incidents that post-date the acquisition, and which were reported from an energytransfer.com email address.
- 31202, **Enable Midstream Partners, LP**. 1 incident. Energy Transfer completed its acquisition of Enable Midstream Partners on December 2, 2021. On October 1, 2023 ET announced that this entity would merge with ET Gathering & Processing LLC.[338] There are 3 total post-2010 incidents for this Operator ID, but we only include 1 incident that post-dates the acquisition, and which was reported from an energytransfer.com email address.
- 39147, **Enable Gas Gathering, LLC**. 1 incident. Energy Transfer completed its acquisition of Enable Midstream Partners on December 2, 2021. On October 1, 2023 ET announced that this entity would merge with ET Gathering & Processing LLC. The only event post-dates the acquisition, and was reported from an energytransfer.com email address.
- 40285, **Gulf Run Transmission, LLC**, 2 incidents.
- 39368, **Crestwood Midstream Partners,** 1 incident.
- 32436, **Midcontinent Express Pipeline LLC**, 1 incident. This is a joint venture where Energy Transfer holds a 50% interest but is not the pipeline operator. The incident was reported from kindermorgan.com email addresses

Climate Calculations

EPA's FLIGHT tool provides access to GHG reporting for individual facilities from 2010 to 2023. The FLIGHT tool allows the user to search by parent company, generating a report across all reporting subsidiaries. We extracted annual reported emissions for "all GHGs" and independently for methane (CH4) emissions. The EPA data makes use of the IPCC AR4 100-year global warming potential of 25.0 to convert methane emissions to CO_2-equivalent.

Because GHGRP reporting requirements changed beginning in 2016, we limit Figure 5 to the years 2016-2023.[339] The FLIGHT data tracks changes in parent companies over time, and includes emissions from facilities only for years when ET or ETP was specified as parent company. In a few past years we found a small number of facilities reporting under a "Sunoco" parent company, but these are excluded from this analysis.

The FLIGHT data reproduced here includes emissions from some facilities where the parent company is assigned equally (50% split) between Energy Transfer and another company. In keeping with our methodology, these emissions are included in our analysis and are not weighted by ownership interest. We note that ET's recent ESG templates show identical EPA-reported Scope 1 emissions to our analysis for years 2021 and 2022.[340] ET's templates show a slightly higher value for their 2023 EPA-reported Scope 1 emissions than does our analysis, which could be the result of ongoing updates to GHGRP data.

The map in Figure 6 shows the location of facilities reporting to GHGRP in 2023. Some facilities appear to report their location as ET headquarters in Dallas, rather than the location where the emissions presumably occurred.

ET reported that in 2023 they transported 5.3 million barrels per day of crude oil, or 1,934 million barrels total in 2023.[341] This represents about 41% of the total U.S. production of 4,721 million barrels per day in that year (ET estimates this as "approximately 40% of the crude oil produced in the United States").[342] When ultimately consumed, each barrel of crude oil emits approximately 0.43 metric tons of CO_2.[343] This means the downstream emissions due to ET's 2023 transported volumes amount to 832 million metric tons of CO_2. Note: this is downstream combustion emissions only, which is smaller than the full lifecycle emissions of producing and transporting a barrel of crude.[344]

ET reported that in 2023 they transported 31,295 BBtu/day of natural gas on their inter- and intrastate pipelines (ET gives a different value for gas transported on their gathering pipelines). The U.S. EIA estimates that one cubic foot of natural gas is equivalent to 1,036 Btu,[345] meaning that ET transported 11,026 billion cubic feet of natural gas in 2023. This represents about 29% of the total of 37,803 billion cubic feet of dry gas production in 2023[346] (ET describes this as "approximately 30% of the natural gas transported in the United States"). The U.S. EPA notes that combustion of 1 therm of natural gas (=0.1 MMBtu) releases 0.0053 metric tons CO_2,[347] meaning that burning this quantity of natural gas leads to 605 million metric tons of CO_2. Again, this represents combustion emissions, not full lifecycle emissions for natural gas production.

The estimated combustion emissions from just the crude oil and natural transported volumes totals 1,437 million metric tons of CO_2 in 2023 — or about 74 times larger than ET's reported Scope 1 emissions for that year.

COBRA Air Pollution and Health Model

We downloaded the file "2010_2022statesum.xlsx" from TCEQ's Point Source Emissions Inventory[348] on 1/13/2025. We included data from 2022 (the latest year available at the time of analysis) and from facilities owned by the following company names. All the entities listed here are found in the list of subsidiaries from Energy Transfer's latest 10-K filings (2023, 2024), except where noted.

- Energy Transfer Co
- Energy Transfer Fuel LP
- Energy Transfer Mont Belvieu NGLs LP
- Energy Transfer Marketing & Terminals LP
- Energy Transfer GC NGL Fractionators LLC
- Energy Transfer Nederland Terminal LLC
- ETC Texas Pipeline Ltd
- ETC Field Services LLC. On June 1, 2018 ET announced that this entity would merge into ETC Texas Pipeline, Ltd.[349]
- Sunoco Pipeline LP
- Sunoco LLC. This entity is described in the latest 10-K as a subsidiary of Sunoco LP, which is in turn described as a consolidated subsidiary of Energy Transfer.
- Trans-Pecos Pipeline LLC
- Trunkline Gas Company LLC
- Panhandle Eastern Pipe Line Company LP

- Florida Gas Transmission Co LLC
- Transwestern Pipeline Company LLC
- HFOTCO LLC
- Enable Midstream Partners LP. On October 1, 2023 ET announced that this entity would merge with ET Gathering & Processing LLC.[350]

We found 92 facilities listed in the emissions inventory under these entity names. Two pairs of these had the same facility name, and it was unclear if they were duplicate entries. Conservatively we kept only one of each for the analysis, bringing the total facilities analyzed to 90.

We then used the U.S. EPA's CO-Benefits Risk Assessment Health Impacts Screening and Mapping Tool (COBRA, desktop version 5.1) to estimate health impacts due to exposure to fine particulate matter (PM2.5) and ozone (O3) air pollution. COBRA takes as inputs emissions of PM2.5, nitrogen oxides (NOx), sulfur dioxide (SO2) and volatile organic compounds (VOCs), which can be specified either as absolute increases (or decreases) measured in tons, or else as a percentage increase (or decrease) relative to the existing emissions baseline. We model all emissions as absolute increases. The Emissions Inventory data provides annual emissions of those four air pollutants for each facility.

Emissions are specified at the county level for the contiguous 48 states. COBRA also specifies the sector (or "tier") where the emissions originate, which determines the stack height of the facility used in the model. The 90 facilities analyzed represent a range of different facility types, but for this preliminary analysis we specify that all emissions are released from the "low" stack height category (less than 250 meters in height).[351] We assume a 2% discount rate. COBRA reports health impacts for the year 2023.

COBRA estimates more than 20 non-overlapping health impacts and their economic equivalents at the county level. In our preliminary analysis we focus on 8 health impacts: Total Premature Deaths (high and low estimates), Total Health-Related Costs (high and low estimates), Asthma Onset and Symptoms, and Lost Work and School Days. The map in Figure 7 shows the locations of the 90 facilities (blue dots) overlaid on the COBRA-estimated premature death impacts (high estimate) for each county in Texas. Note that the health impacts of these 90 facilities are not limited to Texas.

We emphasize that this is a preliminary analysis of air pollution impacts, and future analysis could refine these assumptions and results. See the *Permit To Kill* report published by Sierra Club and Greenpeace USA, for further discussion of COBRA.[352]

Penalties Data

A large and incomplete dataset of financial penalties and other enforcement costs was gathered from U.S. federal and state agency databases and other sources. The dataset includes information on events that triggered a regulatory enforcement action by one or more courts or government agencies (which could include potential regulatory and compliance violations, enforcement actions, inspection noncompliance issues, and other events), and details about the financial penalties and other costs that resulted for the responsible entities.

All entities in the dataset are listed as subsidiaries of Energy Transfer or Sunoco in their 10-K filings, or are joint ventures where they hold a greater than 25% interest. As noted above, and in keeping with the methodology from the *Oil and Water* report, we include penalties for both Energy Transfer and Sunoco entities, including incidents that pre-date their 2012 merger. For all other subsidiaries and joint ventures, we exclude incidents that pre-date their acquisition by ET.

Data sources included PHMSA enforcement data, state regulatory data, OSHA enforcement data, press releases from the U.S. DOJ, entries from the U.S. EPA's ECHO database,[353] ET and Sunoco's annual reports, third-party compilations, and other sources. The raw data included over 2,200 potential violations.

We include all closed PHMSA enforcement actions dating back to 2003 as found in PHMSA's enforcement summary database.[354] For non-PHMSA enforcement actions, we limit the data to violations with assessed penalties greater than $100,000 and after the year 2000, with a few exceptions which are noted in the spreadsheet. Only penalties that have been finalized (through the issuance of a final order by the government agency or judicial body issuing/enforcing a financial penalty) were included in the penalties data. Penalties that have been issued but not finalized are not included.

We separated financial costs that were designated as "penalties" from "other enforcement costs." The latter category could include costs associated with investing in equipment upgrades, remediating polluted land or water, funding programs or services for local residents, providing improved operating plans to a government agency, or other costs.

The lack of standardized data on such violations across regulators presents uncertainties. For a small number of penalties, we were only able to confirm that a final penalty was assessed based on the incident's ECHO record, which does not always include a link to the government order or agreement. For a few incidents, the Texas Commission on Environmental Quality has deferred payment of some portion of the assessed penalty.

We categorized the monetary settlements related to MTBE contamination to be "other enforcement costs" rather than "penalties." For three of the MTBE settlements, the total settlement amount was publicly reported, but not how the total was divided between the various named companies (of which Sunoco was one). For these cases, we include the settlement in the spreadsheet and on the map, but we do not include a monetary estimate in the "Other Costs" column.

The final penalties dataset includes 134 incidents, which led to a total of $104,751,216 in assessed penalties, and over $440 million in additional enforcement costs.

Maps

Shapefiles of the U.S. pipeline network were downloaded from the U.S. EIA's Energy Atlas.[355] The EIA shapefiles specify the operator for some of the individual pipeline segments, and where those operator names were identified as ET or one of its subsidiaries, we indicated that on the maps. We note that the EIA shapefiles used in this report may not fully reflect ET's current pipeline operations, and are included only for visual comparison purposes.

In Figures 1-4 and 6, the volume of the reported incident or emission is indicated by the size of the marker (above a minimum markersize).

We present an interactive web map to visualize data presented in this report on spills, releases, and penalties amassed by Energy Transfer's network of operations.[356] This web map displays the data on hazardous liquid spills, gas releases and violations described above.

Incidents reported to PHMSA typically report a point location for where the spill or release occurred. As such, all locations for these incidents on the web map are informed by the location reported to PHMSA. We also include other details (such as the commodity spilled or released, or the volume of the release) as they were reported to PHMSA.

Some incidents in the violations data are related to a spill or release that was reported to PHMSA. In these instances, we do not show duplicate incidents on the map but combine the penalty and the spill/release information to reflect the singular incident at the location reported to PHMSA.

For all other penalties, we rely on other sources to locate the incident that led to a penalty or other compliance costs. For some incidents, we are able to geolocate the facility described in the violation or enforcement action materials cited in the penalties data using ECHO's facility data or company filings. Some facility locations are not listed on official government or company sources, in which case we used the location of the city/town where the facility resides as the location in our web map.

Penalties that involved business misconduct (such as market manipulation charges) were geolocated to the company headquarters in Dallas, TX. There were 9 financial penalties incurred by Sunoco Pipeline LP that do not correspond to a particular pipeline or facility, according to public records we surveyed. These instances were also represented at the company's headquarters in Dallas, TX on the web map.

Some penalties and compliance costs were issued to a pipeline network, in which case we used line data for the relevant pipeline system. We used data downloaded from the U.S. EIA's Energy Atlas and from ArcGIS's Living Atlas.[357] For all incidents involving a pipeline network, we used the name of the pipeline system to identify the line data that reflected the network most accurately. For pipeline systems Lone Star NGL, Wolverine, Pegasus, and Permian pipeline route data was sourced from the operations map available on Energy Transfer's website on September 12, 2025 because they were not listed in EIA's Energy Atlas by name.[358]

Finally, we represented a number of penalties as polygons covering entire states in the web map. These incidents correspond to instances of MTBE contamination, which occurred over multiple regions and were brought to courts by state governments. In one particular MTBE case, Sunoco was implicated with a number of other companies for MTBE contamination across multiple states.[359] The settlement was a response to hundreds of cases brought by local governments and individuals which were consolidated in a multi-district litigation (MDL) and argued at the federal level. Given the lack of public records on where exactly Sunoco Inc. contributed to MTBE contamination in this case, we represent the MDL settlement as at the company's headquarters on the web map.

The data in the web map can be cross-referenced with the ET Hazardous Liquid Spills or the ET Gas Releases data using the report number assigned by PHMSA, and penalties data can be cross-referenced using the penalty ID variable.

Bayou Bridge Oil Pipeline Construction in Acadia Parish, Louisiana. (Credit: Julie Dermansky, Greenpeace).

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