

**ENERGY TRANSFER OPERATING, L.P.**

8111 Westchester Drive, Suite 600

Dallas, Texas 75225

(214) 981-0700

March 18, 2019

**VIA EDGAR**

Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549-4628

Attn: Karina Dorin  
Office of Natural Resources

**Re: Energy Transfer Operating, L.P.  
Registration Statement on  
Form S-4 File No. 333-229843**

Ladies and Gentlemen:

Energy Transfer Operating, L.P. (the "**Registrant**") hereby requests, pursuant to Rule 461 of the rules and regulations promulgated under the Securities Act of 1933, as amended, the acceleration of the effective date of the above-captioned Registration Statement to 4:00 P.M., Washington, D.C. time, on March 20, 2019 or as soon as practicable thereafter, unless the Registrant notifies you otherwise prior to such time.

Very truly yours,

**ENERGY TRANSFER OPERATING, L.P.**

By: Energy Transfer Partners GP, L.P.  
its general partner

By: Energy Transfer Partners, L.L.C.  
its general partner

/s/ Thomas E. Long

By: Thomas E. Long  
Chief Financial Officer

**SUNOCO LOGISTICS PARTNERS OPERATIONS, L.P.**

By: Sunoco Logistics Partners GP LLC  
its general partner

/s/ Thomas E. Long

By: Thomas E. Long  
Chief Financial Officer

Cc: William N. Finnegan IV, Latham & Watkins LLP  
Debbie P. Yee, Latham & Watkins LLP