



PIPELINE PUNKS · INTELLIGENCE SERIES

Action Summary

Less reading. More doing.

October 13, 2026 · Sample edition: all five briefs ranked into one list

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QUESTION THE HYPE. KEEP IT FLOWING.

SOURCED. NOT SOLD.

COMMAND SNAPSHOT

5

ACT NOW

3

BUILD AND TEST

5

WATCH ITEMS

1

CONFLICT CAUGHT

Highest priority: Make the October 14 IRS excise deposit and confirm surcharge billing picks up the delayed October 14 EIA diesel price.

Release status: Operations Brief held and corrected (Edition 2). AI Field Report, Compliance Radar, Vendor and Tech Watch and Seasonal Readiness clear to forward.

The answer: Two things are due tomorrow (Oct 14): the IRS excise deposit and the holiday-delayed EIA diesel index for surcharge billing. Colorado September returns are due Oct 26. Do not change dyed-diesel handling: the IRS notice under EO 14435 is overdue, and the order covers only the \$4041 user tax, not the \$4081 rack tax. Colorado winter rules are already in force, so lock in winter-diesel specs and backup supply now. No earlier Action Summary was found, so every item is marked NEW.

1. Act Now

1. Oct 14: make the IRS excise deposit and update surcharges from the delayed EIA index [NEW](#)

Deadline: Wed Oct 14 (1 day). **Why:** The semimonthly deposit covers Sept 27–30 under the special September rule, and a missed deposit draws penalties. EIA skipped Monday's price release because of the holiday, so surcharge jobs may carry forward the Oct 5 value (Rocky Mountain diesel \$6.2670/gal). **Action:** Deposit via EFTPS. Once EIA publishes on Oct 14, confirm that surcharge and cost-plus billing picked up the new value.

From: Compliance Deadline Radar; Petroleum Operations Brief. **Source:** [IRS Pub. 509](#) · [EIA Gasoline and Diesel Fuel Update](#)

2. Colorado September distributor, ERS, PFAS and LPG/NG returns [NEW](#)

Deadline: Mon Oct 26 (13 days). Returns are due on the 26th, not the 25th. **Why:** This is the highest-weight state filing, and the ERS rate changed on Oct 1. September gallons stay at \$0.0125/gal. October gallons move to \$0.009375/gal, shown rounded as \$0.0094 in the brief. **Action:** File September at \$0.0125. Confirm that invoices dated Oct 1 or later carry \$0.009375. **From:** Compliance Deadline Radar (rates confirmed on CDOR's page).

Source: [CDOR Fuel Tax](#) · [CDOR rates](#)

3. Hold dyed-diesel practices: federal relief is not operative, and Colorado has only paused enforcement [NEW](#)

Trigger: Now. Treasury's 5-day deadline (about Oct 10) has passed with no IRS notice, and the relief window ends Dec 31 (79 days). **Why:** Customers will ask for on-road dyed fuel. Colorado EO D 2026 020 pauses highway enforcement but does not address special fuel tax. Under IRS Pub. 510, a seller who knows of on-road use can be jointly liable for the backup tax. **Action:** Keep current dyed and clear practices and invoice tax lines. Keep paying the \$4081 tax. Brief customer service and drivers on the approved answer. Stage an ERP tax-code switch but leave it off. Log customer, vehicle and stated use on dyed sales. Ask CDOR about special fuel tax and CDOT about weight-permit terms. **From:** Petroleum Operations Brief; Compliance Deadline Radar. **Source:** [Federal Register 2026-20855](#) · [IRS newsroom](#)

4. Colorado winter readiness: chain law is in force, diesel stocks are tight, and winter specs need to be in writing [NEW](#)

Trigger: Now. The must-carry law has applied since Sept 1 and runs through May 31. The first hard freeze or storm sets the real deadline. **Why:** EIA expects distillate stocks about 20% below the 2021–2025 average this winter, with Rocky Mountain diesel at \$6.2670/gal, up \$2.5960/gal on the year. Fines run from \$100 to \$1,000 plus surcharges. ASTM D975 sets no fixed cloud point. **Action:** Check every route and every unit at 16,001 lb or more against the seven must-carry corridors. Get the terminal's winter cloud point and CFPP in writing. Confirm winter supply agreements and a backup terminal. Drain tank-bottom water and add cold-flow treatment while the fuel is still above its cloud point. Review credit limits ahead of peak volume. **From:** Seasonal Readiness; Petroleum Operations Brief. **Source:** [CDOT Must Carry fact sheet](#) · [EIA STEO](#)

5. Prepare the Nov 2 federal filings and confirm no trucks run revoked ELDs [NEW](#)

Deadline: Nov 2 (20 days); Oct 29 deposit (16 days). The ELD deadline passed Oct 6. **Why:** Three filings are due Nov 2: Form 720 for Q3, Forms 720-TO/CS for September, and the IFTA Q3 return. Colorado's Q3 IFTA rates are \$0.2800/gal gasoline and \$0.3350/gal special fuel. The ELD deadline has passed but still has consequences: a carrier using one of the five devices revoked Aug 6 is treated as having no ELD, and drivers can be put out of service. **Action:** Start the workpapers this week. Match the ELD identifiers on your own trucks and your contract carriers' trucks against FMCSA's registered list. **From:** Compliance Deadline Radar; Vendor and Tech Watch. **Source:** [Form 720 instructions](#) · [CDOR IFTA](#) · [FMCSA revoked ELDs](#)

2. Build and Test Now

1. EIA surcharge staleness guard [NEW](#)

Build: A Google Sheet with an Apps Script that pulls EIA weekly on-highway diesel (U.S. and PADD 4) from the public EIA API. It computes the surcharge to \$0.0000/gal and refuses to bill on a stale value. **Answers:** Ops Brief item 4 and the automation note on surcharge logic that tolerates EIA holiday delays. **Tool:** Sheets and Apps Script, because surcharge tables already live in spreadsheets for most small distributors and a time trigger is free. **Minimum test:** Replay the Oct 5–14 holiday week and the Nov 9–12 Veterans Day week against a synthetic surcharge schedule. Pass means it flags "stale" on Oct 12–13, picks up Oct 14 by itself, and matches hand-calculated surcharges to \$0.0001/gal. **Success measure:** no billing run on a carried-forward index, no more than one false stale alert per quarter, and the manual weekly check (about 15 minutes) goes away. **Effort:** Small. **Content:** Yes. It makes a good Pipeline Punks walkthrough with a copyable template.

2. Effective-dated fuel tax and fee checker for invoices [NEW](#)

Build: A Postgres rate table keyed by jurisdiction, product, tax and effective dates, plus a Python checker that flags invoice lines carrying the wrong rate for the delivery date. **Answers:** The Radar's Colorado ERS change on Oct 1, the Utah and Nebraska Jan 1 rate changes, the Seasonal brief's Jan 1, 2027 Colorado loss-allowance change, and the Ops Brief's staged dyed-diesel tax-code switch. **Tool:** Python on Neon Postgres. Effective-date ranges are simple to query in SQL, the data is public, and it can later sit behind a Next.js page. **Minimum test:** Run 300 synthetic invoices dated Sept 20–Oct 20, with about 5% seeded errors: \$0.0125 ERS after Oct 1, \$0.009375 before it, a missing ERS line, and a dyed-diesel line with no tax-exempt code. Pass means every seeded error is caught with zero false flags. **Success measure:** errors caught before filing, plus minutes saved per monthly CO return reconciliation. **Effort:** Small to medium. **Content:** Yes. "Rate changes break invoices" is a strong demo with only synthetic data.

3. Bulk-plant daily variance reconciler with a cumulative-variance trend test [NEW](#)

Build: A Python script that closes the daily book-to-physical equation for each tank in net gallons, then flags tolerance breaks and slow cumulative trends. A local model writes a draft exception note for a person to review. **Answers:** The AI Field Report's 30-day pilot (sections 2, 5 and 6). **Tool:** Python with Postgres on the home server, using Ollama for the draft notes, so the pattern is ready for private gauge and ticket data later. The rules do the reconciling; the model only drafts text. **Minimum test:** Generate 60 days of synthetic data for 3 tanks (clear diesel, dyed diesel, gasoline) with gauge noise and 4 injected faults: a short-load, a gross/net mix-up, an unticketed wagon load, and a 0.1%/day slow leak. Pass means all 4 are flagged, the leak within 10 days, with no more than 3 false alarms per tank-month, and every draft note cites the right BOL or ticket. **Success measure:** faults caught, days from fault to flag, false alarms, and reconciliation minutes per day. **Effort:** Medium. **Content:** Yes. It is a strong public demo and pairs naturally with the Field Report.

3. Watch List

Item	What changes its status	Next check
IRS notice under EO 14435 (§7508A deferral, §6715 relief) NEW	Notice posted with repayment date and deposit-penalty terms; then decide whether to turn on the staged ERP tax code	Oct 15, then daily
IEA Governing Board, Oct 14–15 NEW	A specific U.S. diesel volume or timing; also whether Rocky Mountain racks follow futures	Oct 16
EPA Gasoline Distribution NESHAP reconsideration (bulk gasoline plants, cargo-tank vapor tightness) NEW	Decision to comment; the paperwork comment deadline to OMB is Oct 28 and the main comment deadline is Nov 12	Oct 28
Utah 2027 motor fuel rate (temporary \$0.3190/gal ends Jan 1) NEW	Tax Commission publishes the indexed rate (statutory deadline Nov 2); then load it into the rate table	Nov 2
Visa/Mastercard settlement (MDL 1720) NEW	Final approval or denial at the reported Nov 16 hearing; until then make no surcharge or card-acceptance change	Nov 17

4. Conflicts and Gaps

- **Which federal diesel tax is deferred (caught and corrected before release).** Edition 1 of the Ops Brief said "the federal \$0.2440/gal diesel tax is deferred." The Radar said the order covers only \$4041 and not the \$4081 rack tax. **The Radar was correct.** The order names only 26 U.S.C. 4041(a)(1)(A) and 4041(b)(1)(B), never mentions \$4081, and defers payment only if Treasury makes a §7508A determination. The Ops Brief was held and corrected in Edition 2, with a correction note, before it was released. [Federal Register 2026-20855](#)
- **Colorado ERS on the September return.** The Radar's plain-text action reads "file returns by Oct 26 and apply the reduced ERS," which could be misread as applying to September. **CDOR:** \$0.0125/gal through September and \$0.009375/gal from October. The Radar's \$0.0094 is a rounding; use \$0.009375 in calculations. [CDOR rates](#)
- **Colorado dyed diesel.** The Radar says state dyed-fuel rules still apply and does not mention Colorado EO D 2026 020. The Ops Brief reports the enforcement pause from news coverage, and the EO text was not reviewed. Both can be true: it is an enforcement pause, not a rule or tax change. The gap is that CDOR's special-fuel-tax position is still unknown.
- **Colorado HB26-1289 loss allowance.** Seasonal Readiness says the enrolled text is inconsistent (1.5% vs. 1%). The legislature's bill summary says **1%** (from 2%). However, the bill page fetched today showed no signing date. Treat 1% as likely, and confirm both the rate and the bill's status with CDOR before repricing. [HB26-1289](#)
- **Stale or unverified figures.** The EIA prices are from the week of Oct 5 and will be replaced Oct 14. Colorado's November return date (Nov 27 vs. Nov 30, because of Thanksgiving) is unconfirmed. The CDOT and CSP chain-law surcharges differ by \$1. The Russian export-ban expiry (Oct 31), the OFAC tranche volumes, and the Visa/MC hearing date come from secondary reporting. Geotab's diesel discount of \$0.4200/gal and its \$250,000 fraud guarantee are company claims. Kansas, New Mexico, Utah and Wyoming weekend due dates and Oklahoma dates were not verified by the Radar.

5. Coverage

- **Petroleum Operations Brief:** Oct 13, 2026, read in full. Edition 1 was held for the federal diesel tax wording and released as corrected Edition 2. It arrived Tuesday rather than the usual Monday.
- **Petroleum AI Field Report:** Oct 13, 2026 (Bulk-Plant Inventory Variance), read in full, latest of two same-day sends. It arrived Tuesday rather than Monday.
- **Compliance Deadline Radar:** Oct 13, 2026, read in full, latest of two same-day sends. On cadence.
- **Vendor and Tech Watch:** October 2026, sent Oct 13, read in full. It is 11 days later than the usual 2nd-of-month send.
- **Seasonal Readiness:** Oct 13, 2026 (Winter Diesel and Cold-Weather Operations), read in full. On cadence for October.
- **Previous Action Summary:** None found in sent mail back to Sept 15, so all items are NEW.

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