



Gulf LNG
Energy, LLC
a Kinder Morgan, GE company

June 26, 2013

Mr. Wayne T. Lamoi
Director, Southern Region
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
233 Peachtree Street, Suite 600
Atlanta, GA 30303

**Re: Warning Letter
CPF 2-2012-3004W**

Dear Mr. Lamoi:

Gulf LNG Company LLC ("GLNG") is in receipt of the above referenced Warning Letter, dated November 27, 2012. The letter refers to two items of probable violation of the Pipeline Safety Regulations in 49 CFR 193. GLNG offers a response to each item below.

Please note that your original letter was addressed to Mr. Dwayne Burton, Vice President Engineering/Operations. Mr. Burton has retired and I have assumed his former role. Consequently, please address all future correspondence regarding these matters to me.

1. 193.2619 Control systems.

.....(c) Control systems in service, but not normally in operation, such as relief valves and automatic shutdown devices, and control systems for internal shutoff valves for bottom penetration tanks must be inspected and tested once each calendar year, not exceeding 15 months, with the following exceptions:

.....(2) Control systems that are intended for fire protection must be inspected and tested at regular intervals not to exceed 6 months.

Gulf LNG did not inspect and test control systems intended for fire protection at intervals not to exceed 6 months.

GLNG Response

As noted in your Warning Letter, subsequent to the PHMSA inspection, Gulf LNG provided records indicating that all of the above-referenced fire protection control systems had been

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inspected and tested. Furthermore, in order to preclude a recurrence, the "Not To Exceed (NTE)" dates (i.e. the compliance dates) of each semi-annual fire/gas cause and effect test have been corrected in GLNG's tracking system to ensure inspection at intervals not exceeding 6 months.

2. 193.2629 External corrosion control: buried or submerged components.

(a) Each buried or submerged component that is subject to external corrosive attack must be protected from external corrosion by –

.....(2) The following means:

.....(ii) A cathodic protection system designed to protect components in their entirety in accordance with the requirements of 192.463 of this chapter and placed in operation before October 23, 1981, or within 1 year after the component is constructed or installed, whichever is later.

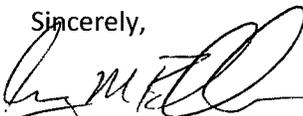
Gulf LNG did not protect from external corrosion, by a cathodic protection system, certain buried components that were subject to external corrosive attack within one year after the components were installed.

GLNG Response

As noted in your Warning Letter, subsequent to the PHMSA inspection, Gulf LNG conveyed via email dated November 14, 2012, that its contractor will provide cathodic protection to all buried steel and ductile iron firewater system components (work expected to commence by January 2013). GLNG's contractor has begun this work to install cathodic protection and the work is approximately 80% complete as of the date of this response letter.

GLNG believes that the activities described herein are fully responsive to the PHMSA findings from the October 22-25, 2012, inspection and that the findings are adequately satisfied. If you have any questions, please do not hesitate to contact me.

Sincerely,



Gary M. Buchler

Vice President – Engineering/Operations

Bcc: Reji George
Steve Heard
Scott Walden
Ken Peters
Ms. Jill Bockenstette
Ms. Cindy Jacop