



**Southern LNG  
Company, L.L.C.**  
a Kinder Morgan company

February 21, 2020

Mr. James A. Urisko  
Director, Office of Pipeline Safety  
Southern Region  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
230 Peachtree Street, N.W.  
Suite 2100  
Atlanta, Georgia 30303

Re: Southern LNG Company, L.L.C. CPF No. 2-2019-3001  
Request for Settlement Meeting  
Request for Hearing, Written Response and Statement of Issues

Dear Mr. Urisko:

The Pipeline Hazardous Materials and Safety Administration (PHMSA or the Agency) Southern Region issued a Notice of Probable Violation (NOPV) and Proposed Civil Penalty to Southern LNG Company, L.L.C. (Southern LNG or Company) that was received on December 20, 2019. The NOPV alleges two violations of 49 C.F.R. Part 191 regarding incident reporting and safety-related condition reporting at the Company's Elba Island liquified natural gas (LNG) terminal and proposes a civil penalty of \$55,200 for both items.

The Company had been in discussions with PHMSA with regard to the extent of its jurisdiction at the Elba Island LNG marine terminal prior to issuance of the NOPV, and Southern LNG anticipated that those discussions would continue. As a result, Southern LNG was surprised by the issuance of the NOPV. The Company believes that the issues raised in the NOPV and Proposed Civil Penalty warrant further discussion between the parties and this matter is capable of resolution without resort to a hearing. Accordingly, Southern LNG respectfully requests a settlement meeting with the Southern Region.

In order to preserve its rights, Southern LNG is filing with this letter a Request for Hearing along with a written response and statement of issues, pursuant to 49 C.F.R. §§ 190.208(a)(4) and 190.211(b). On January 13, 2020, PHMSA granted Southern LNG an extension for responding to the NOPV until February 24, 2020. This Request for Hearing is therefore timely filed pursuant to 49 C.F.R. § 190.208.

Jaime Hernandez will be contacting you to try to schedule a meeting or you can reach me at 713-369-8763.

Thank you for your consideration.



Kenneth W. Grubb  
Chief Operating Officer  
Natural Gas Pipelines

Attachment

cc: Paul Roberti, PHMSA Chief Counsel  
Jaime Hernandez  
Jessica Toll, Esq.  
Catherine Little, Troutman Sanders  
Annie Cook, Troutman Sanders