

FEB 23 2018

February 16, 2018

**BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED
(7016 3010 0000 4493 7643)**

Mr. Alan K. Mayberry
Associate Administrator
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
2nd Floor, Mail Stop E24-455
Washington, DC 20590

Re: Request for Hearing
In the Matter of Sabine Pass Liquefaction, LLC
CPF No. 4-2018-3001H

Dear Mr. Mayberry:

On behalf of Sabine Pass Liquefaction, LLC (Sabine Pass), we respectfully request a hearing on the above referenced Corrective Action Order (CAO). The CAO was issued by the Pipeline and Hazardous Materials Safety Administration to Sabine Pass on February 08, 2018. Enclosed is a Request for Hearing and Statement of Issues.

Sabine Pass continues to be committed to working cooperatively with PHMSA informally to develop insight into the root cause of the incident on January 22, 2018. We believe that is the most practical and efficient means to develop insight into the incident and to design and implement a safe and reliable return to service of the Affected Tanks identified in the CAO. Consequently, Sabine Pass is filing this Request for Hearing to preserve its procedural rights to contest the CAO in the event PHMSA and Sabine Pass cannot reach a resolution through informal discussion. To permit the parties time to reach consensus, we respectfully request that PHMSA schedule the hearing 60 days hence with the understanding that Sabine Pass expects to withdraw its request for hearing if the parties can reach satisfactory resolution of these matters in the interim.

Kevin A. Ewing
Partner

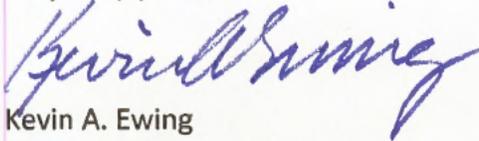
T: +1.202.828.7638
2001 M Street NW, Suite 900, Washington, DC 20036-3310
kevin.ewing@bracewell.com bracewell.com

BRACEWELL

Mr. Alan K. Mayberry
February 16, 2018
Page 2

In the event that the hearing becomes necessary, we will submit to the Presiding Officer additional pre-hearing materials at least 10 days prior to the date of the hearing pursuant to 49 C.F.R. § 190.211(d).

Very truly yours,



Kevin A. Ewing
Counsel to Cheniere Energy, Inc.

Enclosures

cc (w/ encls.):

Ms. Linda Daugherty, Deputy Associate Administrator for Field Operations, OPS
Mr. Frank Causey, Acting Region Director; Southwestern Region, OPS
Mr. Douglas D. Shanda, President, Sabine Pass Liquefaction, LLC
Mr. Sean Markowitz, General Counsel, Cheniere Energy, Inc.
Mr. Michael Weller, Senior Counsel, Cheniere Energy, Inc.
Ms. Bryn S. Karaus, Van Ness Feldman LLP

**Before the
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety**

In the Matter of)	
Sabine Pass Liquefaction, LLC)	CPF No. 4-2018-3001H
Respondent)	REQUEST FOR HEARING AND REQUEST FOR CASE FILE

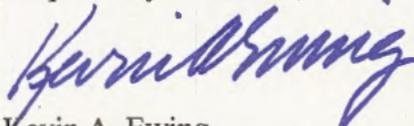
Sabine Pass Liquefaction LLC (Sabine Pass), pursuant to 49 C.F.R. §§ 190.211 and 190.233 respectfully requests an in-person hearing on the Corrective Action Order (CAO) referred to above. The CAO was issued by the Associate Administrator of the Pipeline and Hazardous Materials Safety Administration (PHMSA) to Sabine Pass on February 08, 2018, and was received by Sabine Pass on the same day. Pursuant to 49 C.F.R. §190.233(c)(2), this request is timely.

As required by 49 C.F.R. §190.211(b), this Request for Hearing is accompanied by a Statement of Issues that Sabine Pass intends to raise at the hearing. As required by 49 C.F.R. §190.211(b), this document serves as notice that Sabine Pass will be represented by Mr. Sean Markowitz, General Counsel, Mr. Michael Weller, Senior Counsel, and outside counsel at Bracewell LLP and Van Ness Feldman LLP.

Sabine Pass continues to be committed to working cooperatively with PHMSA informally to develop insight into the root cause of the incident on January 22, 2018. We believe this is the most practical and efficient means to develop insight into the incident and to design and implement a safe and reliable return to service of the Affected Tanks identified in the CAO. To permit the parties time to reach consensus, we respectfully request that PHMSA schedule the hearing 60 days hence with the understanding that Sabine Pass expects to withdraw its request for hearing if the parties can reach satisfactory resolution of these matters in the interim. If a hearing is ultimately required, Sabine Pass intends to submit materials in advance of the hearing in accordance with 49 C.F.R. §190.211(d) and intends to present testimony at the hearing.

Pursuant to 49 C.F.R. §190.233(c)(3), Sabine Pass requests a copy of all materials in the case file associated with or relied upon in the CAO or in PHMSA's decision to issue the CAO.

Respectfully submitted,


Kevin A. Ewing
Bracewell LLP
Counsel to Cheniere Energy, Inc.

Dated: February 16, 2018

**Before the
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety**

In the Matter of)
)
Sabine Pass Liquefaction, LLC)
)
Respondent)
)

CPF No. 4-2018-3001H

STATEMENT OF ISSUES

In connection with its Request for a Hearing and in accordance with the requirements of 49 C.F.R. §190.211(b), Sabine Pass Liquefaction LLC (Sabine Pass) hereby provides the Statement of Issues that it intends to raise at the requested hearing.

Sabine Pass shares the Pipeline and Hazardous Materials Safety Administration's goal of ensuring public safety. Although Sabine Pass has requested a Hearing on the issues set forth in the Corrective Action Order, CPF No. 4-2018-3001H (CAO), the Company has also requested that PHMSA delay such Hearing to allow the parties an opportunity to confer and discuss the issues outlined below. If the parties are able to reach a resolution on some or all of the issues set forth below, Sabine Pass intends to withdraw its Request for a Hearing as to those issues.

At this time, Sabine Pass intends to raise the following issues at the Hearing:

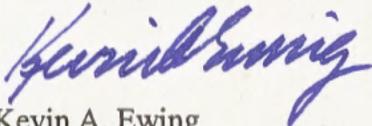
- I. The determination of necessity for the CAO is not supported by the evidence or the current status of the Affected Tanks.
- II. The CAO contains numerous factual errors, unsubstantiated statements, and misleading statements that undermine the findings, determinations, and requirements in the CAO.
- III. The identical treatment of Tank S-101 and Tank S-103 in the CAO is not supported by the evidence.
- IV. Sabine Pass has already removed the Affected Tanks from commercial and operational LNG service; therefore Corrective Action No. 1 is moot and Corrective Action No. 2 is overbroad.
- V. Corrective Action No. 6 is overbroad including with respect to the preconditions for return to service of the Affected Tanks and the requirement for Director approval with respect to Tank S-101.
- VI. The Information Request set forth in Corrective Action No. 8 is overbroad and impracticable.

- VII. Corrective Action No. 13 is, with respect to certain information, impracticable without the approval of third-parties providing reports or information, and appropriate PHMSA measures to secure the information.
- VIII. The CAO establishes deadlines that are moot, impracticable, over-burdensome, and unnecessary.

In addition we reserve our right to challenge the validity of the CAO. The preceding issues apply to the CAO as a whole, including each of the corrective action items. Sabine Pass reserves its rights to raise at the Hearing additional issues that may arise before the hearing date.

For all of the reasons identified above in this Statement of Issues, Sabine Pass's Request for a Hearing, and Sabine Pass's response to PHMSA to date on this matter, and Sabine Pass's willingness to meet with PHMSA to discuss these issues further, the Company respectfully requests that PHMSA agree to schedule the Hearing 60 days hence.

Respectfully submitted,



Kevin A. Ewing
Bracewell LLP
Counsel to Cheniere Energy, Inc.

Dated: February 16, 2018