

## NOTICE OF AMENDMENT

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

January 8, 2020

Aaron Stephenson  
Senior Vice President, Operations  
Cheniere Corpus Christi Pipeline  
700 Milam St., Suite 1900  
Houston, Texas 77002

**CPF 4-2020-1003M**

Dear Mr. Stephenson:

From September 9, 2019 to September 13, 2019, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Cheniere Corpus Christi Pipeline's (Cheniere) Operations, Maintenance, and Emergency procedures; Emergency Plan and Integrity Management Plan in Houston, Texas and inspected facilities in San Patricio County, Texas.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within Cheniere's plans or procedures, as described below:

**1. §192.615 Emergency plans.**

**(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:**

**(3) Prompt and effective response to a notice of each type of emergency, including the following:**

- (i) Gas detected inside or near a building.**
- (ii) Fire located near or directly involving a pipeline facility.**
- (iii) Explosion occurring near or directly involving a pipeline facility.**
- (iv) Natural disaster.**

Cheniere's Pipeline Emergency Response Plan did not contain adequate procedures for making a prompt and effective response to a notice of each type of emergency listed in §195.615(a)(3). Specifically, Cheniere's plan did not include all four of the listed types of emergencies. Cheniere must amend its procedures to include all of the requirements under 192.615(a)(3) to include gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster.

#### Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within **60** days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Cheniere Corpus Christi Pipeline maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Mary L. McDaniel P.E., Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2020-1003M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Mary L. McDaniel P.E.  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*