



CERTIFIED MAIL

January 27, 2020

Ms. Mary L. McDaniel P.E.,
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074

RE: CPF 4-2020-1003M

Ms. McDaniel,

This letter is the formal response by Cheniere Corpus Christi Pipeline, LLC. (CCCPL) to Notice of Amendment (NOA) CPF 4-2020-1003M dated January 8, 2020, which identified one (1) inadequacy in CCCPL's Emergency Response Plan (ERP) that requires amendment or further clarification. More specifically, RHMSA noted the following:

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.
 1. Fire located near or directly involving a pipeline facility.
 2. Explosion occurring near or directly involving a pipeline facility.
 3. 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."



CCCPL Response:

CCCPL has added a new section to ERP-PPL-6110, Section 5.0 INCIDENT CLASSIFICATION AND CRITERIA FOR ACTION. A copy of the revised section is provided below.

The proposed changes have been incorporated into the manual and will be communicated and reviewed with personnel prior to implementation using our established manual review process. If you have any questions, or should require additional information, please do not hesitate to contact Don Gregor at (713) 375-5724.

Respectfully,

A handwritten signature in black ink, appearing to read "Chris Williams", written over a series of diagonal lines.

Chris Williams
Vice President, Pipeline Operations
Cheniere LNG O&M Services, LLC.

5.2 Responding to specific types of emergencies

5.2.1 Gas detected inside or near a building

Special precautions must be taken when gas is detected or reported in or near a building.

Ensure all affected operating personnel are made aware of the report and prompt response is made by evacuating building or area and moving to site muster point.

A determination should immediately be made considering the severity of the leak, potential or immediate danger involved. The following steps should be taken if can be done safely;

- Shut off electrical power to building and eliminate other potential ignition sources
- Isolate the building from gas sources, if possible.
- After gas sources are shut off, proceed to the building with a portable combustible gas indicator/detector, and check door seams for an explosive mixture. If an explosive mixture is not found, open the door and insert gas detector in building. If the gas concentration is within safe limits, enter and ventilate the building and determine the cause of the detected gas.
- Once the cause of the detected gas has been determined, contact the appropriate personnel to investigate, repair, and return to service.

5.2.2 Fire or explosion located near or directly involving a pipeline facility

During natural gas fires/explosion and fires involving gas containing facilities, personnel will need to partner with all responding emergency agencies to mutually determine the best course of action. Cheniere implements the Incident Command System protocol and the National Incident Management System to manage emergencies.

Responding to emergency incidents involving a pipeline rupture or fire are as follows.

- Keep to a safe distance. Secure the area. Restrict access, allow only trained personnel into the area.
- Contact the Gas control with the following information:
 - A description of the situation.
 - The location of the fire or explosion and your relative location.
 - Report any known injuries.
 - Report estimated extent of facility damage.
 - An assessment of whether Cheniere personnel can manage the situation.
 - Request appropriate assistance.
 - Notify appropriate emergency response agencies, including law, fire and rescue departments as per section 11.0 of ERP manual.
- Coordinate off-site activities and monitor communications in accordance with plan.
- Evacuate any adjacent facilities or buildings that may be endangered. If need be, wait for assistance to arrive to help with the evacuations.

Pipeline Emergency Response Plan



Controlling Document Type: Procedure

- If the fire is due to escaping gas or some similar flammable material
 - eliminate the flammable fuel source, if possible
 - only fight a fire to the level you were trained.
- If the fire is to be contained by a fire department and the fire involves escaping gas, Cheniere employees should work closely with the fire department to mutually determine the best course of action.
- In some cases, it may be desirable to let the fire burn out by itself.

5.2.3 *Natural Disaster*

Natural disasters and other similar events (e.g. flooding, hurricanes, tornadoes, earthquakes, landslides, etc.) have been known to affect the stability of a pipeline. Therefore, following a disaster event a determination will be made on whether any conditions existed that could have adversely affected the safe operation of the pipeline. If that determination is made, then remedial actions such as reductions in operating pressure and repairs of any damaged facilities or equipment will be implemented. Normal pipeline operations will not be made until it has been determined that the pipeline is now safe for normal operations.

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