



Sabine Pass Liquefaction, LLC
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October 20, 2021

Via: Email

Ms. Mary L. McDaniel P.E.,
Director Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 1110
Houston, Texas 77074

Re: CPF 4-2021-022-NOPV – Response to Notice of Probable Violation and Proposed Compliance Order

Dear Ms. McDaniel:

This letter constitutes the response of Sabine Pass Liquefaction LLC (“Sabine Pass”) to the Notice of Probable Violation and Proposed Compliance Order (“NOPV”) issued by the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) via E-Mail transmission on September 23, 2021. The NOPV was issued following PHMSA’s Control Room Inspection at Sabine Pass, which occurred March 2 through 12, 2020.

The NOPV alleges:

Item 1. 49 CFR 193.2503 – Operating Procedures

“Cheniere failed to follow its written procedures developed to provide safety in normal operations and in responding to an abnormal operation that would affect safety per § 193.2503. Specifically, Cheniere did not follow its Alarm Management Strategy, SP-TS-PRCSS-STR-004165, 4.3.1 Alarm Rationalization (Revision Date: 8/22/2019), which requires an alarm rationalization study to be completed “every two years after initial review against operating data to validate the accuracy of the design assumptions and effectiveness of alarms and operator response. Cheniere provided documentation of its initial Alarm Rationalization Study which was completed in calendar year 2017, but failed to produce a copy of a repeated study that should have been completed in calendar year 2019 per Cheniere’s previously-referenced written procedures.”

Sabine Pass waives the right to a hearing and does not contest the alleged probable violation or proposed compliance order. As a clarification, the referenced document does not require an alarm rationalization “study” every two years. Per Section 4.3.4 of the Alarm Management Strategy, SP-

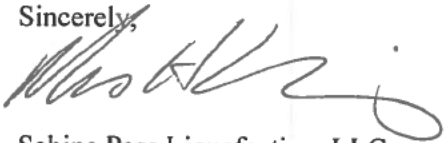
TS-PRCSS-STR-004165, indicates that a “*review will be repeated every two years.*” It is impractical to repeat the entire rationalization study every two years and, as provided for in the Alarm Management Strategy, a review is more appropriate. In accordance with industry practice, the Alarm Management Strategy lays out a comprehensive alarm management program including alarm program stewardship, review and management of change. However, in the interest of continual improvement, Sabine Pass decided to conduct an updated alarm rationalization study in 2021.

Regarding the Proposed Compliance Order, please find attached the 2021 Liquefaction Alarm Rationalization Study completed May 26, 2021.

Sabine Pass estimates it will complete the Regasification Alarm Rationalization Study in December 2021 and therefore requests that the Final Order reflect a due date no sooner than December 15, 2021.

Thank you for your consideration in this matter. Cheniere is committed to working with PHMSA at our facilities and appreciates you and your team’s time and engagement on this matter. If you have any questions or require additional information, please do not hesitate to contact Maas Hinz at (337-569-7700) or Tom Myers at (713-375-5000).

Sincerely,



Sabine Pass Liquefaction, LLC
Mr. Maas Hinz
Vice President and General Manager

Cc: Mr. Aaron Stephenson, President, Sabine Pass Liquefaction, LLC
Mr. Thomas Myers, Vice President, Health and Safety, Cheniere Energy, Inc.
Mr. Paul Nielson, Manager, Regulatory Compliance, Cheniere Energy, Inc.
Mr. Michael Weller, Senior Counsel, Cheniere Energy, Inc.