



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

8701 S. Gessner, Suite 630
Houston TX 77074

NOTICE OF AMENDMENT

ELECTRONIC MAIL - RETURN RECEIPT REQUESTED

March 7, 2022

Kenneth Grubb
Chief Operating Officer
Southern Gulf LNG Company, LLC
1001 Louisiana Street, Suite 1000
Houston, Texas 77002

CPF 4-2022-003-NOA

Dear Mr. Grubb:

From June 21, 2021 through August 25, 2021, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Southern Gulf LNG Company, LLC's (SGLNG) plans and procedures for its facility located in Jackson County, Mississippi.

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

1. **§ 193.2509 Emergency procedures.**
 - (a) ...
 - (b) **To adequately handle each type of emergency identified under paragraph (a) of this section and each fire emergency, each operator must follow one or more manuals of written procedures. The procedures must provide for the following:**
 - (1) **Responding to controllable emergencies, including notifying personnel and using equipment appropriate for handling the emergency.**
 - (2) **Recognizing an uncontrollable emergency and taking action to minimize harm to the public and personnel, including prompt notification of appropriate local officials of the emergency and possible need for evacuation of the public in the vicinity of the LNG plant.**

SGLNG's written emergency procedures were inadequate to ensure safe operation of a pipeline facility. Specifically, SGLNG's written *EHS-PLA-001 Emergency Response Plan* (Revision 12, 11/24/2020) failed to include the definition of a controllable emergency in accordance with § 193.2509(b)(1).

On January 26, 2022, SGLNG submitted revised procedures, *Emergency Response, LNG-O&M 1900* (Revised: 12/01/2021). The revised procedures added the definition of controllable emergency. PHMSA reviewed the revised procedures and found them adequate to satisfy § 193.2509(b)(1).

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. As mentioned above, Southern Gulf LNG Company, LLC previously submitted revised procedures to PHMSA that reflect the amendments required by this Notice. These submitted procedures were reviewed and found to be adequate by PHMSA, therefore, no further action or response is required. If no additional response is received within 30 days of receipt of this Notice, this enforcement will be automatically closed.

It is requested (not mandated) that Southern Gulf LNG Company, LLC 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 4-2022-003-NOA** 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 Enforcement Proceedings*

cc: Carla Roark, Compliance Manager, Southern LNG, Carla_Roark@kindermorgan.com
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