



Southern Gulf LNG
Company, L.L.C.
a Kinder Morgan company

April 5, 2022

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

Re: CPF 4-2022-003-NOA

Dear Ms. McDaniel:

Southern Gulf LNG Company, L.L.C. ("SGLNG") acknowledges receipt of the Pipeline and Hazardous Materials Safety Administration's ("PHMSA") above-referenced Notice of Amendment dated March 7, 2022 (the "NOA"). In the NOA, PHMSA identified the following apparent inadequacy:

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).

Response: SGLNG respectfully disagrees that the regulation requires this definition be included in the plan. That said, as noted in the NOA:



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“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.”

Accordingly, since there is no further action necessary, SGLNG agrees that this matter should be closed. Should you have questions or concerns, please contact me by phone (713-369-8763) or by email at Kenneth_Grubb@kindermorgan.com , or you may contact Jaime Hernandez by phone (713-369-9443) or by email at Jaime_Hernandez@kindermorgan.com.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth W. Grubb". The signature is fluid and cursive, with the first name being the most prominent.

Kenneth W. Grubb
Chief Operating Officer

cc: Carla Roark, Compliance Manager
Jaime Hernandez, Director of Engineering
Andrew Kohout, P.E., Director, Division of LNG Facility Reviews and Inspections,
Office of Energy Projects, Federal Energy Regulatory Commission
(Andrew.kohout@ferc.gov)