



August 24, 2021

**VIA ELECTRONIC MAILTO: Mary.Mcdaniel@dot.gov**

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

**Re: CPF 4-2021-040-NOPV, Notice of Probable Violation and Proposed Compliance Order, dated August 9, 2021 (the "NOPV")**

Dear Ms. McDaniel,

This letter is in response to the above-referenced NOPV sent to Freeport LNG Development, L.P. (hereinafter, "Freeport LNG") on August 9, 2021. The NOPV identified a probable violation of 49 CFR Section 193.2509(b)(4) regarding written procedures that provide for cooperation with appropriate local officials in evacuations and emergencies requiring mutual assistance. Attached to the NOPV was a Proposed Compliance Order identifying proposed measures for Freeport LNG to undertake in order to ensure compliance with the aforementioned regulation. Those measures were comprised of (i) Freeport LNG amending its emergency procedures to include dispatching personnel to the entrance of the terminal to guide fire trucks and emergency response vehicles and maintaining appropriate visibility and lighting at all entrances to the facility, and (ii) after development of the revised procedures, review the existing signage and lighting at all entrances to ensure adequate visibility during all hours.

As required by the Proposed Compliance Order, Freeport LNG has updated its emergency procedures, including both the *Emergency Response Plan Freeport LNG Liquefaction Terminal and Remote Facilities* (ERP) and the *Initial Emergency Response Guidelines* (Red Book), to meet the requirements of §193.2509(b)(4) for cooperating with local officials in evacuations and emergencies requiring mutual assistance. The updated procedures are currently available to every FLNG employee and are placed in key locations within our facilities for reference (including security check points, guard gates, control rooms, etc.).

The procedure updates included:

- 1) Enhancements to both the ERP and the Red Book, which were amended to update all emergency phone numbers from 911 to specific local emergency response phone numbers in order to ensure that all emergency calls (e.g. fire, law enforcement, and emergency responders) are directed to local Freeport / area agencies and resources.



- 2) Additional language added to both the ERP and the Red Book that includes dispatching personnel to the entrance of the terminal to guide fire trucks and emergency response vehicles to the appropriate response location within the facility in the event of an emergency.

More specifically:

- a) The following language was added to the *Initial Emergency Response Guidelines* (Red Book):

*"Security will meet Outside Emergency Responders at Emergency Entrances and escort them to the emergency location with the assistance of the Operations Dept."*

- b) The following language was added to the *Emergency Response Plan Freeport LNG Liquefaction Terminal Pretreatment and Remote Facilities* (ERP):

*"In the event that a fire should occur and the Freeport Fire Department is called to respond, Security will notify the Control Room and advise them of the situation. The Security Superintendent will dispatch security personnel to the entrance of the Terminal to guide fire trucks and emergency response vehicles into the facility."*

In addition, as stated in the Proposed Compliance Order, Freeport LNG evaluated the existing signage and lighting at all entrances to the Liquefaction Facility to ensure adequate visibility at all hours. Below are two pictures (day and night) of the newly installed emergency vehicle access sign at Entrance 3 to the Liquefaction Facility. (Entrance 3 is the designated emergency vehicle access entrance where emergency responders will gain access to the Liquefaction Facility.) Further, all entrances to the Liquefaction Facility are well lit, visible and unobstructed. Freeport LNG is also evaluating our other properties for adequate visibility signage and will make modifications as needed.



FLNG believes that these procedure revisions and signage updates will meet the regulatory requirements as specified in the Proposed Compliance Order and will provide FLNG personnel and outside emergency responders (fire, police, etc.) the guidance necessary for an effective response to any emergency.

Should you have any questions or comments, please contact Michael Stephenson, Regulatory Compliance Manager at (979) 415-8728 or via email at [mstephenson@freeportlng.com](mailto:mstephenson@freeportlng.com).

Kind regards,

A handwritten signature in black ink, appearing to read "Mark W. Mallett".

Mark W. Mallett, P.E.  
Senior Vice President – Operations & Projects  
Freeport LNG

cc: Michael Stephenson – FLNG  
Shaw Otis - FLNG