



Cheniere Energy, Inc.
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October 28, 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 4-2021-050-NOA – Response to Notice of Amendment

Dear Ms. McDaniel:

This letter constitutes the response of Sabine Pass Liquefaction LLC (“Sabine Pass”) to the Notice of Amendment (CPF 4-2021-050-NOA) dated September 24, 2021 issued by the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) via email transmission on October 1, 2021. The NOA was issued following PHMSA’s inspection of procedures and records at Sabine Pass, which occurred March 9-12, 2020. The NOA alleges:

Item 1. 49 CFR 193.2503-Operating Procedures:

“Cheniere’s written Operation and Maintenance Procedures do not contain adequate procedures for monitoring components of the LNG facility as required by § 193.2503(a). Specifically, at the time of the inspection, Cheniere did not reference a company procedure that provided requirements for the implementation of the supervisory lock function of the control system.

Cheniere presented several written processes and procedures during the inspection that are specific to monitoring the facility during normal and abnormal operations, including startup and shutdown. However, when requested, Cheniere did not produce an adequate procedure for using the operation mark, a feature within the distributed control system that controls the implementation of the supervisory lock or disablement.

The written response to PHMSA included a “how-to” explanation of the feature but failed to provide the level of detail necessary to direct personnel in the appropriate use and authorizations for such use. Cheniere must revise its procedures to include requirements for personnel to implement operation marks, including the supervisory lock or disablement during operations.”

Sabine Pass does not contest the allegation and has made changes to the Distributed Control System (DCS) to restrict the use of the Operator Mark function. This change was implemented under MOC M20211044-001 provided herein at Attachment A. Sabine Pass has amended section 1.3 of the Distributed Control System (DCS) Operations Procedure, provided herein as Attachment B, to indicate

the Operator Mark function is not used. This change disables the use of the Operator Mark function by Controllers and Supervisors and requires any future use of the Operator Mark functionality be subjected to the Management of Change process and be controlled by procedure.

Cheniere is committed to working with PHMSA at our facilities and appreciates the engagement of you and your team 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 Safety and Environmental, Cheniere Energy, Inc.
Mr. Paul Nielson, Manager, Regulatory Compliance, Cheniere Energy, Inc.
Mr. Michael Weller, Senior Counsel, Cheniere Energy, Inc.