



December 11, 2023

Dear Mr. Bryan Lethcoe
Director, Southwest Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
8701S. Gesner, Suite 630
Houston, Texas 77074

Response to NOTICE OF PROBABLE VIOLATION REFERENCE CPF 4-2023-057-NOPV

On November 16th, 2023, Crowley LNG Puerto Rico, LLC (Crowley) received a NOTICE OF PROBABLE VIOLATION reference CPF 4-2023-057-NOPV from the Office of Pipeline Safety Southwest Region Director and *Proposed Compliance Order*.

The NOTICE OF VIOLATION alleges that Crowley failed to design its LNG facility located in Peñuelas, Puerto Rico, in accordance with NFPA–59A–2001 as required by § 193.2101(a). Specifically, that Crowley failed to provide controls located at the truck loading area that can stop the operation of remotely located pumps used for loading tank cars or tank vehicles, as required by section 8.3.1 of NFPA–59A–2001.

In accordance with 49 CFR §190.208(b)(1), Crowley will not contest the allegations in the subject NOTICE OF PROBABLE VIOLATION and will take the actions in the *Proposed Compliance Order* listed below upon issuance of a Final Order pursuant to 49 CFR §190.213.

In accordance with the *Proposed Compliance Order*, Crowley will:

- A. Install a mechanism at the Crowley Truck Loading Facility that will shut down the LNG in-tank pumps located in the EcoEléctrica LNG Import Terminal. Crowley will provide the following to the Director, Southwest Region within 90 days of issuance of the Final Order:
 - a. A plan detailing the approach and timeline required to install the mechanism, including drawings, cause-and-effect diagram, and P&ID's that illustrate the intended function of the mechanism.
 - b. Updated procedures that incorporate the new mechanism and instructions on its use, including:
 - i. Operations Manual
 - ii. Shutdown Procedure
 - iii. Training Procedure

We look forward to a prompt and successful resolution of this matter. Please don't hesitate to reach out to me if further discussion or information is needed.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'J' followed by a series of loops and a long horizontal stroke extending to the right.

Julio Cintron
Director of LNG Operations
Crowley LNG Puerto Rico, LLC
Carretera Pr -337, Km 3.6 Barrio Tallaboa
Peñuelas, Puerto Rico