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April 16, 2024

US Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
Southwestern Region Office
8701 S. Gessner, Suite 630
Houston, TX 77074

RE: CPF 4-2024-023-NOA – Response to Notice of Amendment

Mr. Lethcoe,

On March 20, 2024, the Pipeline and Hazardous Materials Safety Administration ("PHMSA") issued a Notice of Amendment CPF 4-2024-023-NOA ("NOA") to Cheniere Creole Trail Pipeline, L.P. ("Cheniere") outlining an alleged inadequacy found within Cheniere's procedures identified during an inspection performed on February 21, 2023, through July 21, 2023. This letter constitutes Cheniere's formal response to the NOA. Without admission, Cheniere does not contest the NOA and has amended the relevant sections of OMP-PPL-6000 "*Operation and Maintenance Preamble*" to reflect the changes PHMSA requested. A copy of the revised sections are provided in the attached Appendix.

Cheniere takes our commitment to pipeline safety very seriously and is dedicated to the safety and wellbeing of the communities in the areas where we operate. If you have any questions, or should require additional information, please contact Paul Falgout at (713) 375-5855.

Respectfully,

A handwritten signature in black ink, appearing to read "Chris Williams", is written over a series of horizontal lines that serve as a guide for the signature's placement.

Chris Williams
Vice President, Pipeline Operations

Attachment:

OMP-PPL-6000 Operations and Maintenance Preamble "Appendix"
OMP-PPL-6087 Pipeline Repair Procedure
OMP-PPL-6085 Leak Survey



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Appendix

From February 21, 2023 to July 21, 2023, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C) inspected Cheniere Creole Trail Pipeline, L.P.'s (Cheniere) procedures regarding the transport of natural gas from Gillis, Louisiana, to the Sabine Pass liquefied natural gas facility in Cameron Parish, Louisiana, through its 42-inch pipeline.

NOA Allegation – "Cheniere's procedures are inadequate for safe operation because they do not address the replacement or remediation of pipelines that are known to leak based on the material including (cast iron, unprotected steel, wrought iron, and historic plastics with known issues), design, or past operating and maintenance history of the pipeline. Cheniere's procedure (OMP-PPL-6000, "*Operation and Maintenance Manual*, Rev. 2022") failed to adequately define leak prone pipe and to include a justification for the assertion that it does not operate or own leak prone pipe."

Cheniere's Response –

While Cheniere believes our procedures do adequately facilitate safe operation of our pipelines and pipeline facilities, we have amended our Operations and Maintenance procedure OMP-PPL-6000, "*Operation and Maintenance Preamble*," Appendix A – *PHMSA Advisory Bulletin* to provide more clarity to the agency. Operations and Maintenance procedure OMP-PPL-6000, "*Operation and Maintenance Preamble*," Section 6.0 provides a clear definition of Leak Prone pipe and OMP-PPL-6000, "*Operation and Maintenance Preamble*," Appendix A – *PHMSA Advisory Bulletin*, Section 1.5 "*Leak History*" provides justification on how pipe data is collected, retained, and analyzed for repair or replacement of Leak Prone pipe.

6.0 Glossary of Terms

Leak Prone	A pipeline or component that is determined to be susceptible to leaks. Pipeline material including (unprotected steel, cast iron, wrought iron, or historic plastics with known issues), maintenance and operation history, and design will be considered when making this determination.
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Cheniere's justification for the assertion that it does not operate leak prone pipe is documented in Operations and Maintenance (O&M) procedure OMP-PPL-6000, "*Operation and Maintenance Preamble*," Appendix A – *PHMSA Advisory Bulletin*, Section 1.5 "*Leak History*." Cheniere does not operate or have a history of leak prone pipe based on the materials, design, or past maintenance and operation history. Cheniere's Creole Trail Pipeline (CTPL) was designed in 2007 in accordance with 49 CFR 192.7 "Incorporated by Reference Standards" and industry best practices applicable at the time of design and construction. The mainline pipe was designed to a diameter of 42" API 5L-PSL 2



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Carbon Steel pipe with various wall thickness and yield strength depending on the Class Locations, Horizontal Drills, High Consequence Areas, etc. All pipe design was based on maintaining a Maximum Allowable Operating Pressure (MAOP) of 1440 PSI. Cheniere's O&M Procedures and programs including Integrity Management, Damage Prevention, Control Room Management, Public Education, and Operator Qualification are implemented to minimize the release of methane gas including prevention, identification, monitoring, controlling, and remediation. Leak Detection and Grading are defined in O&M procedure OMP-PPL-6085 "*Leak Survey*" along with repair or replacement of pipe defined in O&M procedure OMP-PPL-6087 "*Pipeline Repair Procedures*." Cheniere's O&M procedure OMP-PPL-6000, "*Operation and Maintenance Preamble*," Appendix A – PHMSA Advisory Bulletin" captures the requirements of Section 114 of the Pipeline and Enhancing Safety Act of 2020, 49 U.S.C 60108(a)(2)(D) and 49 U.S.C 60108(a)(2)(E) as well as the guidance provided in the PHMSA Advisory Bulletin published to the Federal Register on June 10, 2021.

1.5 Leak History	Currently the Company has not detected any methane leaks based on pipeline material, design, or past operating and maintenance history. The Company will continue to monitor for methane releases by utilizing the Company inspection and maintenance procedures and programs listed in procedure OMP-PPL-6000, "Operation and Maintenance Preamble", Appendix A, Section 1.4 "O&M Procedures." Pipeline O&M Procedures are implemented to minimize the release of methane gas including prevention, identification, monitoring, controlling, and remediation. Leak Detection and Grading is determined in O&M procedure OMP-PPL-6085 "Leak Survey." Annually, the Integrity Engineer shall gather leak data and incorporate into the Integrity Management risk analysis to determine if leak prone pipe exists. All pipeline or pipeline facility leaks due to material defects or damage will be repaired or replaced per Company procedure OMP-PPL-6087 " <i>Pipeline Repair Procedures</i> ".
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Supporting procedures OMP-PPL-6000, "*Operation and Maintenance Preamble - Appendix A*," OMP-PPL-6085 "*Leak Survey*," and OMP-PPL-6087 "*Pipeline Repair Procedures*" are attached for your review.