



September 16, 2024

Bryan J. Lethcoe
Director, Southwest Region, PHMSA
8701 S. Gessner, Suite 630
Houston, Texas 77074

Re: CPF 4-2024-039-WL

Dear Mr. Lethcoe:

This letter is a response to Warning Letter CPF 4-2024-039-WL issued to Golden Pass LNG Terminal LLC (GPLNG), on August 16, 2024. GPLNG respectfully disagrees with the interpretations and alleged deficiencies of documentation provided that served as the basis for the Warning Letter (“Letter”) for the following reasons:

First, NFPA-59A-2001 Section 6.3.1. states;

*“Spring washers or similar devices designed to compensate for the contraction and expansion of bolted connections during operating cycles shall be used **where required.**”* [Emphasis added].

This regulatory citation does not impose the mandatory use of spring washers, or similar devices, in all cases.

Second, in response to the Pipeline and Hazardous Materials Safety Administration’s (PHMSA’s) request for drafts and preliminary calculations, GPLNG provided final detailed design calculations and supporting documentation on multiple occasions to PHMSA and submitted its design for the subject piping systems to the Federal Energy Regulatory Commission (FERC) for review and authorization to proceed with construction of these systems. GPLNG is confident that final design meets the requirements of 40 CFR 193.2301. GPLNG’s documentation demonstrates that every flange under thermal and cycling loads / stress, including the corresponding piping configuration and supports, were validated against industry standards and all *applicable* regulatory requirements and is leak free.

Based on GPLNG’s knowledge, there are no applicable regulations that would require GPLNG to provide preliminary, draft or other documentation of the iterative process GPLNG’s engineering contractor went through to arrive at final design, as suggested by PHMSA staff. GPLNG asked PHMSA to provide a citation to such a regulation and did not receive one. PHMSA was provided with all design, engineering and construction information in GPLNG’s possession necessary to demonstrate that GPLNG’s piping systems met the required design standards specified in 40 CFR 193 and, by reference, NFPA-59A-2001.



For additional context, information was provided on more than sixteen (16) occasions between February 14, 2023, and May 9, 2024, through various forms of communication between GPLNG and PHMSA Southwest Region Field Operations. These exchanges included emails, site inspections, online conferences and conference calls to discuss 'DC-Piping Systems Q21 and Q22 Bolted Connections'. During these interactions PHMSA inspectors had an opportunity to meet with EPC piping engineers involved in the facility piping design and were provided with detailed explanations of how the design process worked, inspectors were walked through examples of bolted connections calculations for several piping systems showing no need for spring washers and GPLNG has responded to all PHMSA inspectors' questions. In addition, prior to receiving this Warning Letter, PHMSA staff verbally indicated to GPLNG personnel that the Bolted Connections design satisfied 49 CFR 193 and, by reference, NFPA 59A (2001) Chapter 6.3.1 requirements.

In summary, PHMSA's allegation that Golden Pass LNG failed to construct its facility in accordance with the requirements of 49 CFR 193 and, by reference, NFPA-59A-2001 as required by §193.2301 lacks any legal or technical standing.

GPLNG appreciates the opportunity to engage with PHMSA on this issue, and to continue working with its inspectors.

Respectfully,

DocuSigned by:

A blue ink signature of Jeremy Horn, written in a cursive style, enclosed within a blue DocuSign signature box.

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Jeremy Horn

Vice President, Operations

Golden Pass LNG Terminal LLC

Cc: S. Diane Neal, Assistant General Counsel, GPLNG
Keith Coyle, GPLNG Counsel, Babst Calland
Steven Andrews, Sr. Regulatory Advisor, GPLNG