September 28, 2024

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 AMENDMENT CPF 4-2024-041-NOA

On August 28th, 2024, Eagle LNG Partners ('Eagle LNG') received a NOTICE OF AMENDMENT CPF 4-2024-041-NOA (the 'NOA') from the Office of Pipeline Safety Southwest Region Director.

The NOA alleges that:

A. Eagle LNG's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 193.2441(c). Specifically, that Eagle LNG's Operational Procedures Manual, EAG-OPS-001, (Rev. 2; June 22, 2023), section 4.0, failed to explicitly require continuous attendance in the control center.

B. Eagle LNG's written procedures for conducting operations and maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 193.2605(b). Specifically, Eagle LNG's Maintenance Procedures Manual, EAG-MPM-01, (Rev. 1; Apr. 15, 2023), section 22.0, failed to ensure prompt corrective or remedial action is taken whenever an operator learns by inspection or otherwise that atmospheric, external, or internal corrosion is not controlled as required by Part 193, Subpart G in accordance with § 193.2637 because it did not define "prompt" with a specific time frame for the completion of corrective or remedial actions.

The NOA notes that following the receipt of this NOA, Eagle LNG has 30 days to submit written comments, revised procedures, or a request for a hearing under § 190.211.

In accordance with 49 CFR §190.206(a), Eagle LNG will not contest the allegations in the subject NOA and is submitting updated procedures with this response. Specifically, Eagle LNG has updated the following procedures:

A. Eagle LNG's Operational Procedures Manual, EAG-OPS-001, *(Rev. 3; September 27, 2024)*, section 4.0. Eagle LNG has revised this procedure to require continuous attendance in the control center in accordance with § 193.2441(c).
B. Eagle LNG's Maintenance Procedures Manual, EAG-MPM-01, *(Rev. 3; September 27, 2024)*, section 4.0. Eagle LNG has revised its procedure in Section 22.0 to define "prompt" with a specific time frame of 90 days for the completion of corrective or remedial actions in accordance with §193.2605(b) and §193.2637. Eagle LNG notes in this response that 49 CFR §193 does not define "prompt" nor prescribe a specific time frame for completion of corrective or remedial actions in accordance with §193.2637.

Copies of the revised procedures are included in Attachment 1 (CONFIDENTIAL) to this response letter.

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,

Sean Lalani
President
Eagle LNG Partners
Research Forest Lakeside No.4
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The Woodlands, Texas