

October 23, 2025

VIA ELECTRONIC MAIL TO: bcothran@ventureglobalng.com

Brian Cothran
Chief Operating Officer
Venture Global Calcasieu Pass, LLC
1001 19th Street North, Suite 1500
Arlington, Virginia 22209

Re: CPF No. 4-2024-047-NOPV

Dear Mr. Cothran:

Enclosed please find the Final Order issued in the above-referenced case. It withdraws the allegation of violation in the Notice of Probable Violation issued on October 22, 2024. Accordingly, this case is now closed. Service of the Final Order by e-mail is effective upon the date of transmission and acknowledgement of receipt as provided under 49 CFR § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

Linda Daugherty
Acting Associate Administrator
for Pipeline Safety

Enclosure

cc: Bryan Lethcoe, Director, Southwest Region, Office of Pipeline Safety, PHMSA
Cassie Harrison, Director, Regulatory Compliance, Venture Global,
cassie.harrison@ventureglobalng.com

CONFIRMATION OF RECEIPT REQUESTED

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, D.C. 20590**

In the Matter of	)	
	)	
Venture Global Calcasieu Pass, LLC,	)	CPF No. 4-2024-047-NOPV
	)	
Respondent.	)	
	)	

FINAL ORDER

From July 24 through September 1, 2023, pursuant to 49 U.S.C. § 60117, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), conducted an on-site pipeline safety inspection of the facilities and records of Venture Global Calcasieu Pass, LLC's (Venture Global or Respondent) liquefied natural gas facility located in Calcasieu Pass, Louisiana.

As a result of the inspection, the Director, Southwest Region, OPS (Director), issued to Respondent, by letter dated October 22, 2024, a Notice of Probable Violation and Proposed Compliance Order (Notice). In accordance with 49 CFR § 190.207, the Notice proposed finding that Venture Global had violated 49 CFR § 193.2503 and proposed ordering Respondent to take certain measures to correct the alleged violation. The Notice also included an additional three warning items pursuant to 49 CFR § 190.205, which warned Respondent to correct the probable violations or face possible future enforcement action.

Venture Global responded to the Notice by letter dated November 21, 2024 (Response). Venture Global also provided a Supplemental Response via a letter dated May 8, 2025 after it requested and received a copy of the case file. Venture Global contested the allegation and offered additional information in response to the Notice. Respondent did not request a hearing and therefore has waived its right to one.

WITHDRAWAL OF ALLEGATION

The Notice alleged that Respondent violated 49 CFR Part 193, as follows:

Item 4: The Notice alleged that Respondent violated 49 CFR § 193.2503(b), which states:

§ 193.2503 Operating procedures.

Each operator shall follow one or more manuals of written procedures to provide safety in normal operation and in responding to an abnormal operation that would affect safety. The procedures must include provisions for:

- (a) ...
- (b) Startup and shutdown, including for initial startup, performance testing to demonstrate that components will operate satisfactory in service.

The Notice alleged that Respondent violated 49 CFR § 193.2503(b) by failing to include in its manual of written procedures provisions for performance testing to demonstrate that components will operate satisfactorily in service. Specifically, the Notice alleged Venture Global's manual was missing procedures for performance testing whenever a startup or shutdown was necessary, such as when the facility's components were taken out of service for repairs or maintenance.

In its Response, Venture Global contested the Notice allegation and stated that it was in compliance with the pipeline safety regulations through its Standard Operating Procedures (SOPs) and Pre-Startup Safety Reviews (PSSRs). Specifically, Venture Global pointed to a section of its SOPs called *Performance Testing*, highlighting a requirement in the procedure that required performance testing before putting the terminal into service from initial startup, to demonstrate that pipeline terminal components would operate safely while in service. Venture Global further argued that its PSSRs ensured that no components were placed into service until they passed all tests and applicable inspections. Venture Global included the purpose statement of its PSSR in its Response which included a requirement that no component could be placed into service until it passed all applicable test and inspections required by section 193.2303¹ and NFPA 59A-2001. The PSSR further stated that all new or modified equipment must be built, installed, and tested in accordance with its design requirements.

Venture Global stated in its Supplemental Response that after the inspection it had instituted a new procedure, *LTS Initial/Turnaround Startup*, to increase effectiveness and that this new procedure, effective November 11, 2024, incorporated the requirements of its prior SOP that PHMSA reviewed at the time of the inspection. Venture Global provided PHMSA a copy of this procedure with its Supplemental Response. The stated purpose of the new procedure is to provide instructions for safe startup from outage or turnaround and to demonstrate components will operate satisfactorily in service within their design limits.

After considering all of the evidence and circumstances of this case, I hereby withdraw the alleged violation 49 CFR § 193.2503(b) without prejudice, as a matter of administrative discretion. The decision to exercise enforcement discretion in this matter is specific to the facts of this specific enforcement matter and circumstances.

COMPLIANCE ORDER

¹ 49 CFR § 193.2303 states "No person may place in service any component until it passes all applicable inspections and tests prescribed by this subpart and NFPA-59A-2001 (incorporated by reference, *see* § 193.2013)."

The Notice proposed a compliance order with respect to Item 4 in the Notice for the violation of 49 CFR § 193.2503(b). Under 49 U.S.C. § 60118(a), each person who engages in the transportation of liquefied natural gas or who owns or operates a pipeline facility is required to comply with the applicable safety standards established under chapter 601. As discussed above, Item 4 has been withdrawn. Therefore, the compliance terms proposed in the Notice for that Item are not included in this Order.

WARNING ITEMS

With respect to Items 1, 2, and 3, the Notice alleged probable violations of Parts 191 and 193 but identified them as warning items pursuant to section 190.205. The warnings were for:

49 CFR § 191.5(a) **(Item 1)** — Respondent's alleged failure to report an unintentional gas loss of three million cubic feet or more at the earliest practicable moment following discovery, but no later than one hour after confirmed discovery;

49 CFR § 193.2605(b) **(Item 2)** — Respondent's alleged failure to follow its written procedures for cathodic protection maintenance and conduct a close interval survey within 35 days after a cathodic protection system was installed, energized, and properly adjusted; and

49 CFR § 193.2635(a) **(Item 3)** — Respondent's alleged failure to test its cathodic protection systems for three underground storage/mix 50 tanks once each calendar year, but with intervals not exceeding 15 months to determine if the system meets the requirements of section 192.463.

Venture Global presented information in its Response showing that it had taken certain actions to address the cited items. Further, with regard to Item 1, Venture Global explained that the multi-day venting operation resulting in the release, and the steps taken to calculate and verify the quantity of the release, were complex. Venture Global contended that it met the incident reporting obligations by timely reporting the incident upon confirmed discovery that the reporting threshold had been exceeded. Under section 190.205, PHMSA does not adjudicate warning items to determine whether a probable violation occurred. If OPS finds a violation of any of these items in a subsequent inspection, Respondent may be subject to future enforcement action.

The terms and conditions of this Final Order are effective upon service in accordance with 49 CFR § 190.5.

Linda Daugherty
Acting Associate Administrator
for Pipeline Safety

Date Issued