



Southern Gulf LNG
Company, L.L.C.
a Kinder Morgan company

December 13, 2024

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

Re: CPF 4-2024-061-NOA

Dear Mr. Lethcoe:

Southern Gulf LNG Company LLC (Gulf LNG) acknowledges receipt of the referenced Notice of Amendment (NOA) and responds as follows. For the avoidance of confusion, the items inspected, and inadequacies stated in the NOA, are restated below, with Gulf LNG's response immediately following.

1. § 193.2509 Emergency procedures.

(a)

(b) To adequately handle each type of emergency identified under paragraph (a) of this section and each fire emergency, each operator must follow one or more manuals of written procedures. The procedures must provide for the following:

(1)

(3) Coordinating with appropriate local officials in preparation of an emergency evacuation plan, which sets forth the steps required to protect the public in the event of an emergency, including catastrophic failure of an LNG storage tank.

Specifically, Gulf LNG's *Emergency Response Plan, EHS-PLA-001*, (Rev. 13; January 10, 2024) failed to include operator- and facility-specific procedures for coordinating with appropriate local officials in the emergency evacuation plan that sets forth the steps required to protect the public in the event of an emergency, including catastrophic failure of an LNG storage tank.

Response:

As noted in the NOA, Gulf LNG submitted preliminary revised procedures, *Emergency Response Plan, EHS-PLA-001*, (Rev. 13; January 10, 2024). The final procedure was published on April 10, 2024.



2. § 193.2605 Maintenance procedures.

(a)

(b) Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control. The procedures must include:

(1)

(2) A description of other actions necessary to maintain the LNG plant according to the requirements of this subpart.

§ 193.2637 Remedial measures.

Prompt corrective or remedial action must be taken whenever an operator learns by inspection or otherwise that atmospheric, external, or internal corrosion is not controlled as required by this subpart.

Gulf LNG's written procedures for conducting maintenance activities were inadequate to assure safe operation of a pipeline facility in accordance with § 193.2605(b)(2). Specifically, Gulf LNG's procedures, *Internal Corrosion Control, LNG O&M 906*, (October 1, 2017) and *Inspecting for Atmospheric Corrosion, LNG O&M 918*, (November 1, 2021), failed to provide a timeframe for "prompt" remediation of all types of corrosion in accordance with § 193.2637.

Response:

As noted in the NOA, Gulf LNG submitted revised procedures, adding a timeframe for prompt remediation in *Inspecting for Atmospheric Corrosion, LNG O&M 918*, (April 4, 2024.) Attached as Exhibit 1 is the DRAFT *Internal Corrosion Control, LNG O&M 906*, with clarification on prompt actions. *Internal Corrosion Control, LNG O&M 906* must go through our internal review process for approval in the January 2025 meeting. Gulf LNG will submit the final approved procedure.

Gulf LNG is committed to operating in a safe and compliant manner and trusts that the information contained within this response adequately addresses the NOA. Should you have any questions or require further information, please contact me immediately. I can be reached at Jess.Coleman@kindermorgan.com, or by phone at 713-420-4501. You can also feel free to reach out to Morris Bozard, Manager of Technical Compliance at Morris.Bozard@kindermorgan.com or 912-944-3920.

Sincerely,

Jess Coleman
Vice President of Operations

Enclosure