



Southern 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 4-2024-063-NOA

Dear Mr. Lethcoe:

Southern LNG Company, L.L.C. (Southern 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 Southern LNG's response immediately following.

1. § 193.2715 Training: security.

(a)

(b) A written plan of continuing instruction must be conducted at intervals of not more than 2 years to keep all personnel having security duties current on the knowledge and skills they gained in the program of initial instruction.

Southern LNG's written plan was inadequate to provide continuing instruction at intervals of not more than 2 years to keep all personnel having security duties current on the knowledge and skills they gained in the program of initial construction in accordance with § 193.2715(b). Specifically, Southern LNG's procedures, *LNG O&M Plan 199: Personnel Qualification* (Feb. 1, 2015), and *LNG O&M Plan 510: Security, Company Facilities* (Mar. 1, 2023) failed to include a written plan of continuous instruction to ensure all personnel having security duties were current on the requirements of § 193.2175(a).

Southern LNG's *Personnel Qualification* procedure, section 3.4.2 Training: Security, included a restatement of the regulatory language in § 193.2715(b), and its *Security, Company Facility* procedure, section 4 Training, required personnel with security duties to be trained in accordance with the regulations. However, Southern LNG's procedures failed to include a written plan for continuous instruction on the program of initial instruction under § 193.2715(a). Additionally, the LNG Training Matrix and Facility Training Workshop records provided by Southern LNG failed to include continuous training on all elements in § 193.2715(a)(1)-(5).



Southern LNG must revise its procedures to include a written plan for continuous instruction to ensure all personnel with security duties are current on the knowledge and skills gained during the program of initial instruction under §193.2715(a).

Response: Southern LNG has attached as Exhibit 1 its revised Facility Security Plan language. Specifically, language has been added to page 13 of this plan to further clarify our current training program.

2. §193.2903 Security procedures.

Each operator shall prepare and follow one or more manuals of written procedures to provide security for each LNG plant. The procedures must be available at the plant in accordance with §193.2017 and include at least:

(a) A description and schedule of security inspections and patrols performed in accordance with § 193.2913;

(b)

(c) Liaison with local law enforcement officials to keep them informed about current security procedures under this section.

Southern LNG's manual of written procedures was inadequate to provide security for each LNG plant in accordance with § 193.2903. Specifically, Southern LNG's procedure, *LNG Operations and Maintenance Plan 510: Security, Company Facilities* (Mar. 1, 2023), section 3.3 Security Monitoring, failed to include a description and schedule of security inspections and patrols performed in accordance with § 193.2913, and failed to include procedures to liaison with local law enforcement officials to keep them informed about current security procedures, in accordance with § 193.2903(a) and (c), respectively.

Southern LNG must revise its security procedures to include a description and schedule of security inspections and patrols performed in accordance with § 193.2913, and procedures to liaison with local law enforcement officials to keep them informed about current security procedures under §193.2903(c).

Response: Southern LNG has attached as Exhibit 2 its revised Facility Security Plan language. Specifically, language has been added to page 80 of this plan to further clarify our security schedule. We meet annually with local law enforcement to discuss changes in the facility. This requirement is stated in our current LNG O&M 232 which we have also attached as Exhibit 3 for your review.



3. § 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)

(c) Each operator shall include in the manual required by paragraph (b) of this section instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of §191.23 of this subchapter.

Southern LNG's manuals of written procedures for the maintenance of each component were inadequate to assure pipeline safety in accordance with § 193.2605(c). Specifically, Southern LNG's procedure, *LNG Operations and Maintenance Plan 214: Reporting LNG Facility Safety Related Conditions* (Rev. Mar. 1, 2023), failed to provide instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of § 191.23.

Response: Southern LNG previously trained personnel to recognize safety related conditions through a Computer-Based Training (CBT) referred to as NG - LNG - 2YR - [LNG1902_NG] Abnormal Operating Conditions (AOC). Southern LNG enhanced its training with a standalone course for Reporting and Recognizing Safety Related Conditions. We have attached as Exhibit 4 the training course for review. Southern LNG conducted this stand-alone course for operations and maintenance personnel in November 2024. This will be a recurring course every 2 years.

Southern 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 via email at Jess_Coleman@kindermorgan.com, or by phone at (713) 420-4501.

Sincerely,

Jess Coleman
Vice President of Operations

Enclosures