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November 14, 2025

Via Email

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

RE Sabine Pass LNG L.P., CPF No. 4-2025-055-NOA
Written Response Contesting Notice of Amendment, Request for Hearing,
Preliminary Statement of Issues, and Request for Informal Meeting

Dear, Mr. Lethcoe,

Pursuant to 49 C.F.R. § 190.206(a) and §190.211, Sabine Pass LNG L.P., (Sabine Pass) submits a Written Response Contesting the Notice of Amendment (NOA) issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA) on October 16, 2025, in CPF No. 4-2025-055-NOA. Concurrently with this Written Response, Sabine Pass submits a Request for Hearing, Preliminary Statement of Issues, and Request for Informal Meeting to permit the parties to discuss resolving the allegations in the NOA.

Sabine Pass requests that the presiding official delay scheduling a hearing to allow the parties sufficient time to convene a meeting to resolve issues presented in the NOA.

Sabine Pass takes its commitment to pipeline safety very seriously and is dedicated to the safety and wellbeing of the communities in the areas where we operate. Sabine Pass looks forward to working with you and your staff to resolve the NOA. Please do not hesitate to contact the undersigned if you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen Dugat". The signature is fluid and cursive, with the first name "Stephen" and last name "Dugat" clearly distinguishable.

Stephen Dugat
Vice President and General Manager

CC:

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**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY**

In the Matter of	)	
	)	
Sabine Pass LNG, L.P.,	)	CPF No. 4-2025-055-NOA
	)	
Respondent.	)	

**Written Response to Notice of Amendment
of Sabine Pass LNG, L.P.,**

Pursuant to 49 C.F.R. § 190.206(a) (2024), Sabine Pass LNG, L.P. (Sabine Pass) submits a Written Response contesting the Notice of Amendment (NOA) issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA) on October 16, 2025. The NOA arose out of the July 9 to July 25, 2024 inspection of Sabine Pass’s procedures for inspecting, grading, and remediating atmospheric corrosion at the Sabine Pass LNG export terminal. The NOA alleges that Sabine Pass’s External Corrosion Grading Guidelines, Rev. 1, dated September 25, 2023 (Grading Guidelines) are inadequate to ensure the safe operation of a Liquefied Natural Gas (LNG) facility in accordance with § 193.2605(b) and must be revised.

Sabine Pass contests the NOA because PHMSA has not satisfied its burden of proving that the Grading Guidelines are inadequate for the safe operation of the LNG facility or that they must be revised “to ensure clarity, consistency, and technical accuracy.”¹ Sabine Pass requests that PHMSA withdraw the NOA.

Concurrently with this Written Response, Sabine Pass is submitting a Request for a Hearing and a Preliminary Statement of Issues. As provided under 49 U.S.C. § 60117(b)(1)(B),² Sabine Pass also requests an informal meeting to further discuss the NOA and requests that the presiding official postpone scheduling a hearing to allow the parties sufficient time to meet.

I. Introduction

Section 193.2605(b) of PHMSA’s regulations states:

Each operator shall follow one or more manuals of written procedures for the maintenance of each component, including any required corrosion control. The procedure must include: (1) The details of the inspections or tests determined under paragraph (a) of this section and their frequency of

¹ NOA at 2.

² 49 U.S.C. § 60117(b)(1)(B)(2018), as amended by The Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020, Pub. L. No. 116-260, div. R, title I, § 108(a)(2), 134 Stat. 2221, 2223 (Dec. 27, 2020).

performance; and (2) A description of other actions necessary to maintain the LNG plant according to the requirements of this part.³

Sabine Pass's Grading Guidelines assist corrosion inspectors to identify and grade corrosion damage and assign due dates for remediating atmospheric corrosion in Sabine Pass's computerized maintenance management system (CMMS). The NOA alleges that Sabine Pass's Grading Guidelines "are inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2605(b),"⁴ and identifies four areas that allegedly require "significant revision to ensure clarity, consistency, and technical accuracy."⁵

Under the Pipeline Safety Act and the pipeline safety regulations, PHMSA has the burden of proving that Sabine Pass's Grading Guidelines are inadequate for the safe operation of the Sabine Pass LNG Terminal and that they must be revised.⁶ Below, Sabine Pass demonstrates that PHMSA has failed to meet that burden because the NOA's allegations for each of the four areas are inconsistent with PHMSA's Corrosion Guidance, internally inconsistent, and unsupported by the evidence.

II. Sabine Pass's Grading Guidelines

Sabine Pass is LNG import/export terminal that is subject to Part 193 of the pipeline safety regulations. Consistent with § 193.2625, Sabine Pass implements a corrosion control program for metallic components that are susceptible to corrosion.⁷ As required under § 193.2627, Sabine Pass protects exposed components subject to atmospheric corrosion.⁸ Pursuant to § 193.2635(d), Sabine Pass inspects each component protected from atmospheric corrosion at intervals not exceeding three years.⁹ The regulations do not define atmospheric corrosion. PHMSA's Part 192 Corrosion Enforcement Guidance (Corrosion Guidance) defines atmospheric corrosion as "an area of metal loss due to general corrosion, localized corrosion pitting, or peeling scale on the steel surface that has damaged the pipe."¹⁰ No such publicly available Corrosion Guidance exists for Part 193, therefore, for reasons discussed below, the Part 192 Corrosion Guidance provides a reasonable analogue for conducting a Part 193 atmospheric corrosion control program.

PHMSA's Corrosion Guidance addresses the inspection of pipeline or components for all types of corrosion; external, internal and atmospheric. Acknowledging that the regulations and

³ 49 C.F.R. § 193.2605(b).

⁴ NOA at 2.

⁵ *Id.* at 2.

⁶ 49 U.S.C. § 60117(b)(1)(F); 49 C.F.R. § 190.213(a)(1).

⁷ 49 C.F.R. § 193.2625.

⁸ *Id.* § 193.2627.

⁹ *Id.* § 193.2635(d).

¹⁰ PHMSA, Part 192 Corrosion Enforcement Guidance at 120 (Dec. 7, 2015).

(https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/Corrosion_Enforcement_Guidance_Part192_12_7_2015.pdf). See also PHMSA's on-line glossary which defines atmospheric corrosion as "a chemical attack on exposed metal surfaces by elements in the air" and "a chemical change in the pipe or component material resulting from the material's interaction with the atmosphere." <https://primis.phmsa.dot.gov/comm/glossary/index.htm#AtmosphericCorrosion>.

standards incorporated by reference do not contain specific guidance on inspecting for corrosion, the Corrosion Guidance refers to several industry standards, including American Petroleum Institute (API) API 570 (Piping Inspection Code: In-service Inspection, Rating, Repair, and Alteration of Piping Systems) and API 510 (Pressure Vessel Inspection Code: In-Service Inspection, Rating, Repair, and Alteration).¹¹

Section 193.2637 requires that “[p]rompt corrective or remedial action” be taken “whenever an operator learns by inspection or otherwise that atmospheric, external, or internal corrosion is not controlled as required by this part.”¹² While Part 193 does not define “prompt” remediation of atmospheric corrosion at LNG facilities, § 193.2635(d) provides operators “wide latitude” in developing procedures governing inspections of atmospheric corrosion.¹³

The atmospheric corrosion provisions contained in Part 192 reasonably inform an operator’s remediation of atmospheric corrosion of LNG facility components under Part 193. Sections 193.2635(d) and § 192.481(a) both require inspections for atmospheric corrosion at intervals that do not exceed three calendar years.¹⁴ PHMSA’s Corrosion Guidance provides that, if atmospheric corrosion is identified during an inspection an operator is required to protect those areas before the next scheduled inspection. If the corrosion might jeopardize pipeline integrity before the next scheduled inspection, more prompt remedial action may be required.¹⁵

As allowed under the Corrosion Guidance, Sabine Pass uses its CMMS to schedule service requests for corrosion remediation activities based on the severity of the corrosion. The CMMS contains 20 levels of atmospheric corrosion severity, with Level A1-A5 signifying minor/light/slight corrosion and Level A20 signifying the most severe. Corrosion levels with the highest severity rating have the shortest remediation timeframe. Specifically, corrosion levels A15 – A20 receive a “P1 priority” designation, which means the condition must be repaired within five days. Corrosion levels A14 and A13 must be repaired within one and three months respectively. Corrosion levels A12 and below have remediation timelines ranging from six months to 36 months.

The corrosion severity levels and remediation timelines contained in the Grading Guidelines correspond to those reflected in the CMMS. The objective of the Grading Guidelines is to “provide guidance for inspectors to identify corrosion damage, apply appropriate grading and assign due dates for remediation of atmospheric corrosion” in the CMMS.¹⁶ The Grading Guidelines provide a general description of each corrosion level and include a photograph depicting a representative example of each level of corrosion. Like the CMMS, the Grading Guidelines require that all remediation be completed within three years, consistent with PHMSA’s Corrosion Guidance and the atmospheric corrosion inspection requirement in § 193.2635(d).

¹¹ Corrosion Guidance at 128-29.

¹² 49 C.F.R. § 193.2637.

¹³ *Niagara Mohawk Power Corp.*, Final Order, CPF No. 1-2018-3005, 2020 WL 7079884 at *2 (Feb. 24, 2020).

¹⁴ 49 C.F.R. § 192.481(a) (requires that an onshore gas pipeline (other than a Service Line) that is exposed to the atmosphere be inspected for atmospheric corrosion at least once every 3 calendar years, at intervals not exceeding 39 months.”).

¹⁵ Corrosion Guidance at 133.

¹⁶ Grading Guidelines at 5.

Sabine Pass's corrosion inspectors are certified under multiple API standards, including API 570 and API 510 which are referenced in PHMSA's Corrosion Guidance. When assigning a severity level to any service request for remediation, the inspectors rely on their professional training and experience. When generating service requests, the inspectors' selection of the CMMS severity levels and remediation timelines may be further informed by the descriptions and photographic images contained in the Grading Guidelines.

Based on the severity level selected, a service request is assigned a work priority in the CMMS that sets a due date by which the condition must be remediated. For any corrosion assigned a severity level P13 or higher, Sabine Pass's General Inspection Plan requires that the service request identify the specific location of the corrosion.¹⁷ This type of service request constitutes a directive that makes maintenance personnel aware of a specific location of corrosion that requires attention.

III. PHMSA Fails to Meet Its Burden of Proving That the Grading Guidelines Are Inadequate for Safety.

Below, Sabine Pass demonstrates that PHMSA has failed to satisfy its burden of proving that the Grading Guidelines are inadequate for safe operation of the LNG facility and that NOA should be withdrawn.

A. The NOA Fails to Prove That the Grading Guidelines Are Unsupported by Generally Accepted Engineering Practices or Standards.

The first area of the Grading Guidelines that the NOA alleges requires revision is described as follows:

First, in Section 3.2, the procedure's severity criteria do not reference or align with any generally accepted engineering practices or standards. Although the procedure references standards such as ISO 4628-3, API RP 583, API 510, API 570, and API 653 in Section 6.2, none of these are incorporated by reference in § 193.2013 or § 192.7, and none include severity categorizations similar to those defined in Sabine Pass's procedure. For instance, ISO 4628-3 categorizes rusting into six levels, with four categories addressing corrosion on less than 1% of the surface area, and the most severe ISO classification applying to surfaces with 40%-50% rust, whereas Sabine Pass's procedure includes examples of cases with 100% corrosion and visible cracking.¹⁸

This NOA allegation is problematic for several reasons. First, the statement that the Grading Guidelines do not reference any "generally accepted engineering practices or standards" contradicts PHMSA's Corrosion Guidance which specifically refers to API Standard 570 and API Standard 510. These API standards may not be incorporated by reference into Part 193 and Part

¹⁷ Sabine Pass, General Inspection Plan at 12 (Jan. 21, 2025).

¹⁸ NOA at 2.

192, but API Standard 510 is incorporated into PHMSA's Part 195.¹⁹ PHMSA's incorporation of API Standard 510 into Part 195 and the agency's endorsement of both standards in its Corrosion Guidance is evidence that PHMSA considers them to be generally accepted engineering standards. This inconsistency undermines the NOA's allegation.

The NOA also is internally inconsistent. If, as the NOA asserts, the severity criteria contained in the Grading Guidelines "do not reference or align with any generally accepted engineering practices or standards," then it is not clear why differences between the severity levels in the Grading Guidelines and the categorizations contained in ISO 4628-3 are relevant. The NOA does not explain why it makes this comparison.

Moreover, the NOA appears to acknowledge that the severity criteria contained in the Grading Guidelines are *more* expansive and detailed than those contained in ISO 4628-3 because the Grading Guidelines address examples of cases with 100% corrosion and visible cracking while the most severe classification contained in ISO 4628-3 addresses surfaces with 40%-50% rust.²⁰ The NOA does not explain why severity criteria that are more extensive than those contained in ISO 4628-3 supports the allegation that the Grading Guidelines are inadequate.

Part 193 does not prescribe or incorporate by reference standards governing the grading or remediation of atmospheric corrosion conditions. Operators have "wide latitude" to establish their own atmospheric corrosion procedures.²¹ Exercising this wide latitude, Sabine Pass created its Grading Guidelines which are informed by, and in several cases are more prescriptive than, multiple engineering standards, including those recommended in PHMSA's Corrosion Guidance. The Grading Guidelines help inform how Sabine Pass's API-Certified inspectors select a severity level in the CMMS for remediation scheduling purposes.

The NOA does not cite to any engineering standard or principles to support the allegation that the severity levels in the Grading Guidelines are inadequate. The NOA also does not refer any "ascertainable threshold" by which to evaluate the adequacy of the severity levels and remediation timelines contained in the CMMS or Grading Guidelines.²²

Consequently, PHMSA does not satisfy its burden of demonstrating that the Grading Guidelines are inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2605(b).

B. The NOA Fails to Prove That Written Descriptions of Corrosion Do Not Match the Corrosion Photographs or Are Overly Vague.

The second area of the Grading Guidelines that the NOA alleges requires revision is described as follows:

¹⁹ 49 C.F.R. § 195.3.

²⁰ *Id.* at 2.

²¹ *Niagara Mohawk*, 2020 WL 7079884 at *2.

²² *Texas Gas Transmission, LLC*, Final Order, CPF No. 3-2024-048-NOPV, 2025 WL 1424220 at *3 (Apr. 28, 2025) (finding that OPS did not meet its burden of proof in part because it did not "cite to an ascertainable threshold" to prove the existence of the alleged violation).

Second, in Sections 8.0-8.20, the photographic examples provided to illustrate severity conditions are inconsistent with the accompanying written descriptions and, in some instances, are overly vague. For example, Condition A15 includes cracking and heavy corrosion, but the corresponding visual representation illustrates a condition worse than stated. Similarly, Condition A8, which shows a pipe wall fully covered with corrosion pits, is classified only as moderate corrosion. Misalignment between these visual examples and the severity categories worsens the ability of personnel to correctly grade and prioritize corrosion features for repair.²³

This NOA allegation is not supported by the Grading Guidelines.

The NOA describes Condition A15 as depicting “cracking and heavy corrosion.” The Grading Guidelines describe Condition A15 as “Heavy/severe: Heavy accumulation of scale and local deposits. Cracking indicates volume increase due to corrosion product formation at the metal surface.” The NOA omits the Grading Guideline’s description.

The descriptions of Condition A15 in the NOA and the Grading Guidelines both refer to “cracking” and “heavy” corrosion or “accumulation of scale and local deposits.” The NOA does not explain how the corrosion in the photograph for Condition A15 is “worse than stated” in the Grading Guidelines’ written description or how the picture and description are misaligned. The NOA also does not explain why the Grading Guidelines are overly vague when the written description specifically describes “heavy accumulation of scale and local deposits” and “cracking” The NOA does not explain how the written description in the Grading Guidelines should be more clear.

Given that corrosion with a severity designation of Condition A15 is a P1 priority, which is the highest CMMS scheduling priority that must be repaired within five days, PHMSA’s allegation that the description of this corrosion is inadequate for safety is not well founded.

The NOA’s allegations regarding Condition A8 are similarly flawed. The Grading Guidelines describe the corrosion shown in Condition A8 as “Medium/moderate: Measurable corrosion involving the original surface.”²⁴ The NOA describes the photo as showing “a pipe wall fully covered with corrosion pits.” The NOA faults the Grading Guidelines for classifying it “only as moderate corrosion,”²⁵ but does not explain why the Grading Guideline’s description is “overly vague” or inconsistent with the image. The NOA also does not refer to any engineering standard or “ascertainable threshold” to support an alternative description or classification.²⁶

The evidence does not support the NOA’s allegations that the photographs for Conditions A15 and A8 are more severe than their accompanying written descriptions and PHMSA has failed to satisfy its burden of proof.

²³ NOA at 2.

²⁴ Grading Guidelines at 20.

²⁵ *Id.* at 2.

²⁶ *Texas Gas*, 2025 WL 1424220 at *3.

C. The Severity Categorizations Address Corrosion Damage to the Pipeline and Do Not Address Pipeline Coating.

The third area of the Grading Guidelines that the NOA alleges requires revision is described as follows:

Third, the procedure assumes that all severity conditions involve total coating failure and exposed steel surfaces actively undergoing corrosion, and lacks a grading category for pipelines with disbonded, damaged, or otherwise failed coatings. This omission fails to account for the necessity of addressing coating defects, even though such issues are reported during inspections and are critical for corrosion preventions.²⁷

Atmospheric corrosion is “an area of metal loss due to general corrosion, localized corrosion pitting, or peeling scale on the steel surface that has *damaged the pipe*.”²⁸ Consistent with this definition, the Grading Guidelines are focused on the severity of corrosion on the surface of the pipeline and any resulting damage to the pipe. The Grading Guidelines are not intended to address the condition of insulation or coating. The condition of a pipeline’s coating is not an indicator of whether corrosion exists on the pipeline or whether the pipeline is damaged. Even if coating is damaged, there may be no corrosion. If corrosion is not present, then the coating is serving its intended corrosion mitigation purpose.

The lack of references to coating in the Grading Guidelines does not create a safety risk and does not support the allegation that the Grading Guidelines are inadequate for safe operation of an LNG facility. The NOA’s concern is misplaced.

D. The Remediation Severity Categorizations of Conditions A13 and A14 Are Not Inconsistent and Do Not Create a Safety Risk.

The fourth area of the Grading Guidelines that the NOA alleges requires revision is described as follows:

Fourth, the procedure is inconsistent in its prioritization of repairs according to corrosion severity. While Section 3.2 categorizes conditions A13 through A20 as severe or heavy corrosion, Section 3.3 excludes A13 and A14 from P1 priority repairs. This contradiction weakens the credibility of the repair prioritization process and may delay necessary corrective actions for severe conditions.²⁹

²⁷ NOA at 2.

²⁸ Corrosion Guidance at 120 (emphasis added). *See also* <https://primis.phmsa.dot.gov/comm/glossary/index.htm#AtmosphericCorrosion> (PHMSA’s on-line glossary defining atmospheric corrosion as “a chemical attack on exposed metal surfaces by elements in the air” and “a chemical change in the pipe or component material resulting from the material’s interaction with the atmosphere.”)

²⁹ NOA at 2.

Categorizing Conditions A13 and A14 as “severe or heavy corrosion” while not giving them a P1 repair priority is not a contradiction in the Grading Guidelines. The Grading Guidelines reflect eight levels of atmospheric corrosion that are characterized as “severe or heavy corrosion.” Not all of atmospheric corrosion designated as “severe or heavy” warrants a P1 repair priority which requires remediation within 5 days.

The Grading Guidelines require that Conditions A14 and A13 be repaired within one and three months, respectively. These are the next highest remediation priorities after P1. When designating corrosion severity in the CMMS, Sabine Pass’s inspectors exercise their experienced judgments to categorize corrosion and assign remediation priorities. In addition, under the General Inspection Plan, corrosion categorized as either Condition A13 or A14 requires that the inspector generate a service request that is specific to the location of the corrosion condition, in lieu of a service request that may cover a grouping of locations. This type of service request alerts maintenance personnel to a specific instance of corrosion that requires attention. The short repair timeframes of one and three months combined with issuing a service request specific to the corrosion location ensure that Conditions A14 and A13 are remediated in a timely and safe manner that is appropriate to the risk these conditions pose.

There is no contradiction in the Grading Guidelines regarding its approach to setting remediation priorities for Conditions A13 and A14. The NOA allegations are misplaced.

IV. Conclusion

For the reasons set forth above, PHMSA fails to meet its burden of proving that Sabine Pass’s Grading Guidelines are inadequate to ensure the safe operation of the LNG facility under § 193.2605(b). Sabine Pass requests that the NOA be withdrawn.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen Dugat", with a stylized, cursive script.

Stephen Dugat
Vice President and General Manager

November 14, 2025

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY**

In the Matter of	)	
	)	
Sabine Pass LNG, L.P.	)	CPF No. 4-2025-055-NOA
	)	
Respondents.	)	

**Request for Hearing, Preliminary Statement of Issues
and Request for Informal Meeting of
Sabine Pass LNG, L.P.**

Pursuant to § 190.206(a) and § 190.211,¹ Sabine Pass LNG, L.P. (Sabine Pass) submits a Request for Hearing and Preliminary Statement of Issues regarding the Notice of Amendment (NOA) issued on October 16, 2025. The NOA alleges that Sabine Pass’s External Corrosion Grading Guidelines, Rev. 1 (9/25/2023) (Grading Guidelines) are “inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2605(b)” and must be revised. The NOA describes four areas that it alleges require “significant revision to ensure clarity, consistency, and technical accuracy.”²

Concurrently, Sabine Pass is submitting a Written Response contesting the NOA.

As permitted under 49 U.S.C. § 60117(b)(1)(B),³ Sabine Pass requests that PHMSA convene an informal meeting so that the parties can discuss the NOA’s allegations. Sabine Pass also requests that the presiding official delay scheduling a hearing to allow the parties sufficient time to engage in discussions.

Sabine Pass is committed to public safety and operating its pipeline facilities in accordance with PHMSA’s regulations. Sabine Pass takes allegations of non-compliance seriously and looks forward to resolving the NOA’s allegations.

Request for Hearing

Sabine Pass requests that PHMSA convene an in-person hearing. Sabine Pass will be represented by legal counsel at the hearing and intend to raise the issues identified below in the Preliminary Statement of Issues.

¹ 49 C.F.R. §§ 190.206(a) and 190.211 (2024).

² NOA at 2.

³ 49 U.S.C. § 60117(b)(1)(B) (2018), as amended by The Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020, Pub. L. No. 116-260, div. R, title I, § 108(a)(2), 134 Stat. 2221, 2223 (Dec. 27, 2020).

Sabine Pass reserves the right to revise or supplement this Preliminary Statement of Issues at or before the hearing based on any additional information that may be provided during this proceeding, including the informal meeting.

Preliminary Statement of Issues

Item 1 § 193.2605 Maintenance procedures.

Whether PHMSA failed to satisfy its burden of proving the allegation that Sabine Pass's Grading Guidelines are inadequate to ensure the safe operation of an LNG facility in accordance with § 193.2605(b).

Whether PHMSA failed to satisfy its burden of proving that Sabine Pass's Grading Guidelines must be revised to ensure safe operation of an LNG facility and whether requiring such revisions are inappropriate and unsupported by the facts, the case file, the Pipeline Safety Laws and relevant Part 193 regulations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steph Dugat", written in a cursive style.

Stephen Dugat
Vice President and General Manager

November 14, 2025