



June 17, 2026

Mr. Bryan J. Lethcoe
Director, Southwest Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
8701 Gessner, Suite 630
Houston, Texas 77074

Re: *Golden Pass Pipeline LLC, CPF 4-2026-008-NOPV*, Response to Notice of Probable Violation and Proposed Civil Penalty

Dear Mr. Lethcoe:

Pursuant to 49 CFR Section 190.208, Golden Pass Pipeline LLC ("Golden Pass") hereby contests the allegations in the Notice of Probable Violation (NOPV) and Proposed Civil Penalty. Golden Pass also requests the following:

1. A hearing pursuant to 49 CFR § 190.211 to address the following issues:
 - a. Whether PHMSA properly determined that Golden Pass violated 49 CFR §192.461 in its application of external coating on the surface of a segment of pipe;
 - b. Whether PHMSA applied the proper section of its Operator Qualification Plan for welding a temporary cap in conjunction with the removal of a pig trap;
2. Postponement of the hearing until informal settlement discussions are concluded; and
3. A technical conference be scheduled in furtherance of settlement discussions.

In support of its position contesting the NOPV, Golden Pass provides the following response:

Response to Alleged Violations

Allegation No. 1: **§ 192.461 External corrosion control: Protective coating.**
 (a) Each external protective coating, whether conductive or
 insulating, applied for the purpose of external corrosion control
 must –
 (1) Be applied on a properly prepared surface

Golden Pass failed to apply external coating on properly prepared surfaces during construction of its Golden Pass Compression Expansion Project consistent with the requirements of 192.461(a)(1) and its written specifications as required by 192.303. Specifically, Golden Pass failed to properly prepare the surface of the pipe to remove weld splatter and other coating damage from four field joints that sustained damage during production welding prior to the application of field joint coating.

The NOPV states: “During its field inspection of Vidor Compressor Station on March 26, 2024, PHMSA observed weld splatter and other damage to mill applied FBE coating of two field joints (Welds #553, #651). Golden Pass’s written specification Painting & Coatings (USSP-GIE-85-MS-000-S10-0007, Rev. 62, June 2021), Section 7.2.3, ‘Repairs,’ states: ‘Burrs, slivers, scabs, sharp edges, and weld splatter, which become visible after abrasive blasting, shall be removed.’”

Golden Pass’s Response:

While the NOPV references weld splatter at welds #553 and #651, the March 26, 2024 closing summary does not reference weld splatter but instead focuses on blast roughening requirements:

During inspection of field joint coating surface preparation on March 26, 2024, PHMSA inspectors observed that the parent coating on field joints (Welds #553 and #651) was not blast roughened to a minimum distance of 2-in as required by SP-2888’s Application Specification (SP-2888 R.G. Brush GRADE APPLICATION SPECIFICATION (effective August 1, 2018)). In addition, the latest manufacturer’s specification (2018) specifies the minimum requirements for surface preparation for field joint coatings. Furthermore, the operator’s written procedure’s [sic] failed to specify minimum distance blasting of bare steel parent coating.

The language of the alleged violation is inconsistent with PHMSA’s closing summary for welds #553 and #651.

The closeout statements for the instant welds do not reference “weld splatters” but instead focus on blast roughening requirements as in the excerpt above. The purported violation, however, fails to take into account the daily quality control report, completed at the Vidor site by contractor Axis Industries (dated 3/26/2024 and provided to PHMSA the same day), which includes the two blasting stickers, demonstrating that the required surface profiles were achieved. The report shows confirmation of surface preparation, cleanliness, and final dry film thickness (“DFT”), and that the welds passed testing, including that the coating on both welds #553 and #651 was acceptable. Additionally, the cited project specification, section 7.3 of USSP-GIE-85-MS-000-S10-0007, applies to bare steel damage rather than coated pipe. Thus, weld spatter repair is not within the scope of the cited specification.

Allegation 1 further alleges the presence of “track-like imprints on the surface of the field applied liquid epoxy coating of two field joints” (welds #4352 and #4356), stating, that the marks appeared “consistent with coating damage” and determining that the presence of the imprints and coating damage did not conform to Golden Pass’s coating specifications. Contrary to the inspector’s determination, Section 8.3.4(3) of the project specification (USSP-GIE-85-MS-000-S10-0007), does *not* require the removal of damaged or loosely applied coating from bare steel, as suggested. The referenced specification cited by PHMSA is instead applicable to blast cleaning of bare metal



and is not a specification related to damaged field coating as in the instant allegation (see SSPC-SP10/NACE No. 2, “Near White Metal Blast Cleaning”). The “PHMSA Information Requests from 26-27March2024 Inspection” further does not allege damaged field coating but rather makes a supposition that prior to the field coating, areas had not been properly blast cleaned. Section 8.3.4(3) of the project specification, however, is specific to “damaged and loosely adhering coating.” The field joint welds noted above did not demonstrate damaged *and* loosely adhering coating requiring removal. Further, the coating method used by the contractor allowed for removal of damaged coating and loose paint to create a stable substrate as needed. The logical result being, if the substrate was deemed stable, the removal of coating was not required. This preparation method is consistent with the manufacturer’s requirements. Pursuant to the manufacturer’s data sheet, the SP2888 products can be applied to the FBE substrate, as well as to bare steel substrate, the primary requirement being a minimum surface profile of 2.5 mils (properly roughened). If the coating of welds #4352 and #4356 did not display loose adherence or similar damage that would require removal, then the field coating would receive final testing to ensure the application was successful. Accordingly, Golden Pass did not violate 192.461(a)(1) and 192.303.

Based on the above and other evidence in the record, PHMSA has not met its burden in demonstrating that Golden Pass violated 49 CFR §192.461(a)(1) and §192.303. Accordingly, Golden Pass respectfully requests that Allegation No. 1 and the proposed penalty be withdrawn.

Allegation No. 2: §192.805 Qualification program.

**Each operator shall have and follow a written qualification program.
The program shall include provisions to:**

(a) . . .

**(b) Ensure through evaluation that individuals performing
tasks are qualified;**

Golden Pass failed to use properly qualified individuals to perform covered tasks consistent with the requirements of 192.805(b) and its own written qualification program. Specifically, Golden Pass failed to ensure through evaluation that individuals who performed mainline welding on their active pipeline system were qualified according to their written qualification program.

Specifically, Allegation No. 2 asserts the following:

During PHMSA’s field inspection on July 31 and August 1, 2023, four welders welded a 42-in diameter cap onto Golden Pass’s active mainline pipeline at MP00 in Sabine Pass, Texas. This welding activity was identified as a covered task in Golden Pass’s Operator Qualification Plan (USSP-GPI-85-YM-000-M00-0004, Rev 7, Feb 14, 2019), specifically Task CT46 (Mainline Welding on Pipelines). However, upon subsequent review of the qualification records for these four individuals, PHMSA discovered that only one of the four welders was qualified to



perform this task. Consequently, three individuals performed a covered task without the qualifications required by Golden Pass's Operation Qualification Plan.

Golden Pass's Response:

The welding activity observed by PHMSA inspectors involved the completion of a temporary cap installed on the open end of the existing pipeline as part of pig trap removal and modification activities. These activities were associated with temporarily disconnecting pipeline facilities, not performing maintenance welding on an active pipeline. The work being performed falls within the scope of **CT33 – "Abandoning, Disconnecting, Purging and Sealing of Pipeline Facilities,"** as defined in Golden Pass's *Operator Qualification Plan* (USSP-GPO-85-YM-000-M00-0004). Consistent with the task elements, Golden Pass isolated and depressurized the 42-inch segment from MLV1 located just east of MP01 to the pig trap area at MP00 before the pig trap cut out process. The pipeline section remained depressurized until the reinstallation of the modified pig trap, when the temporary cap, and temporary weld were removed.

CT46 – "Mainline Welding on Pipelines," as referenced in the NOPV, is not applicable. CT46 applies specifically to maintenance welding activities, including the repair of welds, cracks, burns and defects on in-service pipelines. None of these activities were performed during the observed work.

The welding activities in question were performed in accordance with applicable regulatory and procedural requirements. The welders were qualified under **API 1104**, as permitted under 49 CFR Part 192. In addition, the work was conducted under the supervision of a qualified individual, Roberto Rodriguez, who held the necessary qualifications for the applicable covered tasks, including those related to safely disconnecting and reconfiguring pipeline facilities.

Section 1.3 of the *Operator Qualification Plan* permits individuals who are not independently qualified to perform covered tasks when acting under the direction and observation of a qualified individual. In this instance, the individuals performing welding operated under the direct supervision and observation of a qualified individual, consistent with this requirement. Furthermore, the applicable **span of control allowed by CT33 was maintained and not exceeded.**

Accordingly, the work was performed in full compliance with both 49 CFR Part 192 and Golden Pass's *Operator Qualification Plan*. Therefore, no violation occurred.

Based on the above and other evidence in the record, PHMSA has not met its burden in demonstrating that Golden Pass violated 49 CFR §192.805(b) and §192.303. Accordingly, Golden Pass respectfully requests that Allegation No. 2 and the proposed penalty be withdrawn.



Conclusion

For the foregoing reasons, Golden Pass Pipeline respectfully requests that the Notice of Probable Violation and Proposed Civil Penalty be withdrawn in its entirety.

Pursuant to 49 CFR §190.211(d), Golden Pass reserves the right “to introduce material, including records, documents, and other exhibits not already in the case file,” recognizing that “the material must be submitted to the Presiding Official and the other party at least 10 days prior to the date of the hearing, unless the Presiding Official sets a different deadline or waives the deadline for good cause.”

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "S. Diane Neal", with a stylized, cursive script.

S. Diane Neal
Assistant General Counsel
Golden Pass Pipeline LLC
713.324.6703
diane.neal@goldenpasslng.com

cc: Timothy O'Shea, Attorney Advisor, PHMSA Southwest Region
Jeremy Horn, Vice President Operations, Golden Pass Pipeline LLC

