



U.S. Department of Transportation

**Pipeline and Hazardous Materials
Safety Administration**

8701 S. Gessner, Suite 630
Houston TX 77074

**NOTICE OF PROBABLE VIOLATION
PROPOSED CIVIL PENALTY
AND
PROPOSED COMPLIANCE ORDER**

VIA ELECTRONIC MAIL TO: kelly.kevin@eversource.com

April 1, 2026

Kevin Kelley
President, Gas Operations
Eversource Energy
4 Technology Drive
Westborough, MA 01581

CPF 4-2026-034-NOPV

Dear Mr. Kelley:

From December 8, 2025 to March 6, 2026, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.) investigated the failure which occurred at Hopkinton LNG Corporation's¹ (Hopkinton LNG) liquefied natural gas (LNG) facility in Hopkinton, Massachusetts on December 8, 2025.

As a result of the investigation, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items investigated and the probable violations are:

¹ Hopkinton LNG Corporation is a wholly owned indirect subsidiary of Eversource Energy.

1. § 193.2505 Cooldown.

(a) The cooldown of each system of components that is subjected to cryogenic temperatures must be limited to a rate and distribution pattern that keeps thermal stresses within design limits during the cooldown period, paying particular attention to the performance of expansion and contraction devices.

Hopkinton LNG failed to limit the cooldown of its system subjected to cryogenic temperatures to a rate and distribution pattern that keeps thermal stresses within design limits during the cooldown period in accordance with § 193.2505(a). Specifically, Hopkinton LNG failed to adequately control the cooldown of its 10-inch LNG transfer pipeline, resulting in excessive thermal stress and a subsequent loss of containment on December 8, 2025.

Operators must have and follow LNG cooldown procedures that require a controlled and gradual reduction in pipe temperature to prevent excessive thermal contraction and stress on piping, supports, and expansion components. (See § 193.2503(g)). Hopkinton LNG's procedure *Operating Manual Volume I* (Rev. 8) did not establish a required cooldown rate or provide clear operational limits to ensure the temperature change occurred within safe design parameters. Instead, the procedure instructed personnel only to observe indirect indicators—such as listening for liquid flow at the end of the 1-inch cooldown line, monitoring a temperature probe in the high-pressure pump house that would read approximately -200°F when LNG arrived, and observing the gas outlet temperature from the DCS vaporization screen. These measures only provided general confirmation that LNG had reached certain points in the system but did not control or limit how quickly the temperature decreased on the 10-inch transfer line.

Because Hopkinton LNG failed to control its cooldown rate and did not adequately manage temperature distribution along the pipeline, the system was exposed to excessive thermal stress during the cooldown process on December 8, 2025. On the morning of December 8, 2025, the temperature on the 10-inch transfer line remained at approximately 30°F until about 9:00 a.m., after which it dropped to -30°F by 9:20 a.m., representing a 60°F decrease in only twenty minutes, or an approximate cooldown rate of 180°F per hour. This failure to properly manage the cooldown operation likely contributed to the mechanical failure on Hopkinton LNG's 10-inch transfer line on December 8, 2025.

Therefore, Hopkinton LNG failed to limit the cooldown of its system subjected to cryogenic temperatures to a rate and distribution pattern that keeps thermal stresses within design limits during the cooldown period in accordance with § 193.2505(a).

2. § 193.2609 Support systems.

Each support system or foundation of each component must be inspected for any detrimental change that could impair support.

Hopkinton LNG failed to inspect each support system or foundation of each component for any detrimental change that could affect support in accordance with § 193.2609. Specifically, Hopkinton LNG failed to conduct adequate inspections of the support systems associated with its 10-inch LNG transfer line.

At the time of the incident in question that occurred during cooldown of its 10-inch LNG transfer pipeline in preparation for vaporization, Hopkinton LNG personnel heard a loud bang near the Booster Compressor Building and observed a vapor cloud near the fire water storage tank. Personnel investigated and confirmed that an LNG release had occurred.

The release likely resulted from a chain of mechanical failures associated with thermal contraction. Based on observable indications after the release, it appears that thermal contractions on the 10-inch LNG transfer line exerted significant force on Support #22. Friction at Support #22 prevented the pipeline from sliding as intended, increasing the shear stress on Axial Stop B. The structural support for Axial Stop B was later found to have pre-existing damage. When this weakened support failed, the pipe shifted suddenly westward, overstressing Anchor Point C and ultimately tearing the pipe at the support saddle attachment, resulting in the LNG release. Post-incident observations identified two missing bolts at Anchor Point C, multiple support slide plates stuck on guides or base plates, and the pipeline displaced more than one foot westward and slightly north.

Anchors are designed to hold piping in a fixed position while allowing calculated thermal contraction to occur in specific directions through guides or sliding supports. The presence of missing anchor bolts and seized sliding supports indicates that the support system was not capable of accommodating the thermal movement expected during LNG pipeline cooldown. Section 193.2609 requires inspections of support systems in order to identify these types of conditions. Pre-accident inspections of the supports conducted by Hopkinton LNG failed to identify these deficiencies and had instead assigned the lowest severity rating to the affected supports, with a recommendation of “no action required.”

Therefore, Hopkinton LNG failed to inspect each support system or foundation of each component for any detrimental change that could affect support in accordance with § 193.2609.

Proposed Civil Penalty

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024, the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023, the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related

series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,412 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 for a related series of violations.

Also, for each violation involving LNG facilities, an additional penalty of not more than \$99,704 occurring on or after December 30, 2024 may be imposed. For each violation involving LNG facilities, an additional penalty of not more than \$97,179 occurring on or after December 28, 2023 and before December 30, 2024 may be imposed. For each violation involving LNG facilities, an additional penalty of not more than \$94,128 occurring on or after January 6, 2023 and before December 28, 2023 may be imposed. For each violation involving LNG facilities, an additional penalty of not more than \$87,362 occurring on or after March 21, 2022 and before January 6, 2023 may be imposed. For each violation involving LNG facilities, an additional penalty of not more than \$82,245 occurring on or after May 3, 2021 and before March 21, 2022 may be imposed. For each violation involving LNG facilities, an additional penalty of not more than \$81,284 occurring on or after January 11, 2021 and before May 3, 2021 may be imposed. For each violation involving LNG facilities, an additional penalty of not more than \$79,875 occurring on or after July 31, 2019 and before January 11, 2021 may be imposed.

We have reviewed the circumstances and supporting documentation involved for the above probable violations and recommend that you be preliminarily assessed a civil penalty of \$360,300 as follows:

<u>Item number</u>	<u>PENALTY</u>
1	\$360,300

Proposed Compliance Order

With respect to Items 1 and 2 pursuant to 49 U.S.C. § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to UGI Energy Services, LLC. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Enforcement Proceedings*. Please refer to this document and note the response options. All material you submit in response to this enforcement action may be made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of

the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. § 552(b).

Following your receipt of this Notice, you have 30 days to respond as described in the enclosed *Response Options*. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order. If you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from receipt of this Notice. The Region Director may extend the period for responding to a written request timely submitted demonstrating good cause for an extension.

In your correspondence on this matter, please refer to CPF 4-2026-034-NOPV and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Bryan Lethcoe
Director, Southwest Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Enforcement Proceedings

cc. Nyoca Davis-Jackson, Lead Engineer, Regulatory Compliance-LNG/LPG (MA & CT),
Eversource Energy, nyoca.davis@eversource.com
Kimberly Cardosi, Superintendent, Hopkinton LNG, Eversource Energy,
kimberly.cardosi@eversource.com
James Blackburn, Director, Liquefied Natural Gas, Eversource Energy,
james.blackburn@eversource.com
James Birch, Public Utilities Engineer, Massachusetts Department of Public Utilities,
Pipeline Safety Division, james.birch@mass.gov
Andrew Kohout, Director, Division of LNG Facility Reviews and Inspections, Office of
Energy Projects, Federal Energy Regulatory Commission, Andrew.Kohout@ferc.gov

PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Hopkinton LNG Corporation (Hopkinton LNG), a Compliance Order incorporating the following remedial requirements to ensure the compliance of Hopkinton LNG with the pipeline safety regulations:

- A. In regard to Item 1 of the Notice pertaining to Hopkinton's LNG failure to limit the cooldown of its system subjected to cryogenic temperatures to a rate and distribution pattern that keeps thermal stresses within design limits during the cooldown period in accordance with § 193.2505(a), Hopkinton LNG must engage a qualified third-party service provider to perform a comprehensive sensor evaluation of all transfer piping systems within **90 Days** of receipt of the Final Order. This evaluation must assess and determine if there are enough sensors to provide sufficient coverage to deliver accurate and reliable operational information during cool down and normal operating conditions. The third-party service provider must provide formal recommendations for corrective actions. Hopkinton LNG must review and implement these recommendations within **180 days** of receipt of the Final Order.

- B. In regard to Item 1 of the Notice pertaining to Hopkinton's LNG failure to limit the cooldown of its system subjected to cryogenic temperatures to a rate and distribution pattern that keeps thermal stresses within design limits during the cooldown period in accordance with § 193.2505(a), Hopkinton LNG must develop, implement, and train personnel on a comprehensive cooldown procedure that specifies controlled cooldown rates, operational limits, and monitoring requirements to prevent recurrence, and must provide training and documentation to ensure all personnel adhere to the procedures, within **240 days** of receipt of the Final Order.

- C. In regard to Item 2 of the Notice pertaining Hopkinton LNG's failure to inspect each support system or foundation of each component for any detrimental change that could affect support in accordance with § 193.2609, Hopkinton LNG must review, evaluate, and revise its inspection procedures to enhance its identification of deficiencies, corrosion, misalignment, mechanical damage, or conditions that could compromise pipeline integrity. The revised procedures must clearly define inspection intervals, acceptable condition criteria, required measurement techniques, and documentation. Hopkinton LNG must submit the revised procedures to the Director for review and approval within **90 days** of receipt of the Final Order.

- D. It is requested (not mandated) that Hopkinton LNG maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and

submit the total to Bryan Lethcoe, Director, Southwest Region, Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.