

Venture Global CP Express, LLC
1401 McKinney Street, Suite 2600
Houston, TX 77010

○ 281.761.9800
www.ventureglobal.com

VIA ELECTRONIC MAIL

April 7, 2026

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

Re: Venture Global CP Express, LLC / CPF 4-2026-035-WL

Dear Mr. Lethcoe:

Pursuant to 49 C.F.R. § 190.205, Venture Global CP Express, LLC (“Venture Global”) submits a written response to the Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) Warning Letter (“Letter”), dated April 2, 2026, in the above-referenced matter.

Venture Global is committed to public safety and to operating its pipeline facilities in accordance with PHMSA’s regulations. We very much appreciate PHMSA’s efforts to ensure Venture Global adheres to all applicable requirements. Venture Global has carefully reviewed PHMSA’s Letter and our own records. While Venture Global recognizes that PHMSA’s regulations do not provide for the adjudication of warning letters, we seek to confirm our adherence to both regulatory requirements and our own comprehensive standards, and to ensure that the public record is balanced and reflects all relevant facts.

For ease of reference, Venture Global has provided below the text from the Letter associated with each inspection finding and responded to each such finding in turn.

INSPECTION FINDING:

- 1. § 192.303 Compliance with specifications or standards.**
Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

Venture Global failed to construct its pipeline system in accordance with written comprehensive specifications or standards consistent with Part 192 in accordance with § 192.303. Specifically, Venture Global failed to follow the requirements in its written procedure, EPCM Roles & Responsibilities Plan (CX-500600-CNS-PLN-GIE-00002) (Rev. 0, 05/06/2024) to ensure safety onsite during construction. Section 7.9.3 of the procedure states that each “Construction Contractor is required to develop a Job Safety

Analysis (JSA) each day and will be based on the scope of work for each crew. In addition, a separate JSA will be needed if conditions, scope of work, or crew location changes. The JSA can be reviewed at tailgate meeting. The Inspector should be present and ensure the JSA report is properly completed by the Construction Contractor and signed by attendees.”

On March 10, 2026, PHMSA personnel at MP 41.700 (Spread 1) observed a gauge plate run being performed after a horizontal directional drilling (HDD) installation. However, there was no JSA form available onsite at the time of PHMSA’s inspection. A completed JSA was required in order to satisfy the requirements of Section 7.9.3 of Venture Global’s EPCM Roles & Responsibilities Plan (CX-500600-CNS-PLN-GIE-00002) (Rev. 0, 05/06/2024) procedure.

Therefore, Venture Global failed to construct its pipeline system in accordance with written comprehensive specifications or standards consistent with Part 192 in accordance with § 192.303.

VENTURE GLOBAL RESPONSE:

A copy of the JSA for the work performed at MP 41.700 was provided to PHMSA on Friday, March 20, 2026 in response to an Exit Summary Report communicated to Venture Global on Thursday, March 12, 2026. The JSA was completed and signed by Nikolas Abbott (JP Services) on Wednesday, March 10, 2026.

Mr. Abbott completed the JSA per Venture Global’s EPCM Roles & Responsibilities Plan (CX-500600-CNS-PLN-GIE-00002) (Rev. 0, 05/06/2024). The language referenced in PHMSA’s finding is applicable to work where the specific job task or location has changed such that a new or modified JSA is warranted. Here, the task addressed in the JSA was not modified or relocated. The JSA was created for the task at hand and for the location identified in the JSA. The work performed and personnel involved were not modified.

Based on the foregoing, Venture Global understood that the provision of the JSA to PHMSA in response to the Exit Summary Report by the date requested in the Exit Summary Report would be sufficient to support that Venture Global has constructed its CP Express pipeline project in accordance with comprehensive written specifications or standards that are consistent with the requirements of 49 C.F.R. § 192.303.

INSPECTION FINDING:

2. § 192.303 Compliance with specifications or standards.

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

Venture Global failed to construct its pipeline system in accordance with written comprehensive specifications or standards consistent with Part 192 in accordance with § 192.303. Specifically, Venture Global failed to follow its written procedures, Welding and Fabrication Specification (VG-000000-PPL-SPC-VGL-00009) (Rev. 10, 01/22/2025) and EPCM Roles & Responsibilities Plan (CX-500600-CNS-PLN-GIE-00002) (Rev. 0, 05/06/2024).

Venture Global’s Welding and Fabrication Specification, Section 8.6 requires the welding inspector to monitor and document that all weld parameters are in compliance with the approved WPS. Section 8.6 requires that the welding inspector must monitor and document welding parameters for each welder a minimum of twice per day. Venture Global’s EPCM Roles & Responsibilities Plan, Section 8.19.2.2 requires that the welding inspector must ensure throughout the project that only properly qualified welding procedures are being used. In addition, Section 8.19.2.7 includes a specific list of equipment, tools and calibration certificates that must be provided by the welding inspector.

On March 11, 2026, PHMSA personnel at the CP2 Meter Station (Spread 4) observed that the welding inspector failed to document the weld parameters as required by Venture Global's written procedures. In addition, the inspector failed to maintain proper calibration records for the equipment used to verify the weld parameter during the production weld activities at the CP2 Meter Station.

Therefore, Venture Global failed to construct its pipeline system in accordance with written comprehensive specifications or standards consistent with Part 192 in accordance with § 192.303.

VENTURE GLOBAL RESPONSE:

Venture Global provided copies of the welding inspectors' qualification records and welding inspection reports to PHMSA on March 20, 2026 in response to an Exit Summary Report communicated to Venture Global on Thursday, March 12, 2026.

The welding inspector performed his tasks and responsibilities in accordance with Venture Global's Welding and Fabrication Specification (VG-000000-PPL-SPC-VGL-00009) (Rev. 10, 01/22/2025) and EPCM Roles & Responsibilities Plan (CX-500600-CNS-PLN-GIE-00002) (Rev. 0, 05/06/2024). The Venture Global Welding and Fabrication Specification (VG-000000-PPL-SPC-VGL-00009) states:

- 8.6. Per API 1104, all essential variables will be monitored daily. The Welding Inspector shall monitor and document that all weld parameters are in compliance with the approved WPS per the following:
- Each welder on project shall be verified a minimum of twice per day.

Daily reports were processed through the Venture Global recordkeeping process and were signed by the specific task inspector and associated chief inspector.

In addition, Section 8.19.2.7 of the EPCM Roles & Responsibilities Plan (CX-500600-CNS-PLN-GIE-00002) states "Calibration certs – Inspectors will provide any required manufacturers calibration certs for their digital equipment." Venture Global provided a copy of the Certificate of Calibration for the Clamp Meter, model Fluke 336, serial number 593180316 to PHMSA via email on Friday, March 27, 2026. The Certification of Calibration documents that the Clamp Meter utilized on the CP Express pipeline project was calibrated successfully and was eligible for use on Wednesday, March 11, 2026.

Based on the foregoing, Venture Global understood that the provision of the qualification and inspection records to PHMSA in response to the Exit Summary Report by the date requested in the Exit Summary Report would be sufficient to support that Venture Global has constructed its CP Express pipeline project in accordance with comprehensive written specifications or standards that are consistent with the requirements of 49 C.F.R. § 192.303.

INSPECTION FINDING:

3. § 192.303 Compliance with specifications or standards.

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

Venture Global failed to construct its pipeline system in accordance with written comprehensive specifications or standards consistent with Part 192 in accordance with § 192.303. Specifically, Venture Global failed to follow its written procedure, Horizontal Directional Drill Plan (CX-500600-CNS-PLN-SUN-00003) (Rev. 2, 03/04/2026).

Section 9 of the Horizontal Directional Drill Plan states that its contractor “maintains fluid performance through the daily sampling, testing and recording of fluid properties throughout drilling operations.” The contractor’s field report requires documentation of fluid performance data including density (lbs/gal), viscosity (secs/qty), solids/sand content (% by vol) and pH.

On March 10, 2026, PHMSA personnel at MP 50.46 Mud Lake HDD (Spread 2) observed a mud technician performing a viscosity test. When asked for a copy of the test documentation, the technician responded that he does not record those readings. In addition, no pH testing was observed during PHMSA’s inspection onsite. When PHMSA requested that Venture Global provide test documentation, Venture Global provided several Drilling Fluid Reports. However, the Drilling Fluid Reports did not document who conducted the testing. In addition, there was no Drilling Fluid Field Testing Report for March 10, 2026.

Therefore, Venture Global failed to construct its pipeline system in accordance with written comprehensive specifications or standards consistent with Part 192 in accordance with § 192.303.

VENTURE GLOBAL RESPONSE:

Venture Global provided copies of the Drilling Fluid Reports to PHMSA on Friday, March 20, 2026 in response to an Exit Summary Report communicated to Venture Global on Thursday, March 12, 2026. The Drilling Fluid Field Testing Report for March 10, 2026 was not included in the original data summary because Venture Global had not completed the process of finalizing the Thursday, March 12, 2026 report before the Friday, March 20, 2026 due date PHMSA established. Please note that the March 10, 2026 report has been uploaded to Venture Global’s LogicalDOC file sharing website. Please note that Venture Global can provide all subsequent Drilling Fluid Reports for the Mud Lake HDD upon written request from PHMSA.

Section 9 of Venture Global’s Horizontal Directional Drill Plan (CX-500600-CNS-PLN-SUN-00003) (Rev. 2, 03/04/2025) states that Venture Global will “[maintain] fluid performance through the daily sampling, testing and recording of fluid properties throughout drilling operations.” Venture Global has demonstrated compliance with the Horizontal Directional Drill Plan document by uploading the requested documents to LogicalDOC on Friday, March 20, 2026 and Thursday, April 2, 2026.

In addition, the employee referenced in PHMSA’s finding was not tasked with the responsibility of documenting the Drilling Fluid Reports values. The site superintendent is the responsible party for documenting such data and is identified in the title box of each report. To clarify, the inspection team did not witness the performance of a pH test and documentation of the associated pH values because a pH test was not performed while on location. The Michels crew performed an additional, out of sequence test per the PHMSA inspector’s request to demonstrate the viscosity testing process.

Venture Global notes that the correct publish date of the Horizontal Directional Drill Plan (CX-500600-CNS-PLN-SUN-00003) is 03/04/2025 (not 03/04/2026).

Based on the foregoing, Venture Global understood that the provision of the Drilling Fluid Reports to PHMSA in response to the Exit Summary Report by the date requested in the Exit Summary Report would be sufficient to support that Venture Global has constructed its CP Express pipeline project in accordance with comprehensive written specifications or standards that are consistent with the requirements of 49 C.F.R. § 192.303.

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Thank you again for PHMSA's support on our project and commitment to ensuring our compliance. Should you have any questions about Venture Global's responses above or require any additional information, please do not hesitate to contact me at 202-759-6738.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Cothran', with a stylized flourish at the end.

Brian Cothran
Chief Operating Officer
VENTURE GLOBAL CP EXPRESS, LLC

cc: Greg Coppola, Senior Vice President, Pipeline
Yvette Abraham, Director, Pipeline Regulatory Compliance
Cole Sterling, Manager, Pipeline Regulatory Compliance