



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

8701 S. Gessner, Suite 630
Houston TX 77074

WARNING LETTER

VIA ELECTRONIC MAIL TO: bcothran@ventureglobalng.com

April 1, 2026

Brian Cothran
Chief Operating Officer
Venture Global CP Express, LLC
1001 19th Street North, Ste 1500
Arlington, VA 22209

CPF 4-2026-035-WL

Dear Mr. Cothran:

From March 10, 2026 through 12, 2026 of the on-site inspection, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Venture Global CP Express LLC's (Venture Global) CP Express pipeline construction project in Jasper and Newton counties in Texas and Calcasieu and Cameron Parishes in Louisiana.

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

- § 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.

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.

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.

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 \$2,391,142 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.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so may result in Venture Global being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2026-035-WL**. Be advised that all material you submit in response to this enforcement action is subject to being 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).

Sincerely,

**BRYAN JEFFERY
LETHCOE**

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JEFFERY LETHCOE
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Bryan Lethcoe

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

Cc: Cole Sterling, Manager, Pipeline Regulatory Compliance,
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