



February 13, 2023

Mr. Terry Turpin  
Director, Office of Energy Projects  
Federal Energy Regulatory Commission (FERC)  
Department of Energy

**RE: Request for Full, Commercial Operations of Phase I; OEP/DLNG/LNG 2, Freeport LNG Development, L.P., Docket Nos. CP03-75-000, CP03-75-002, CP03-75-003, CP03-75-004, CP05-361-000, CP05-361-001, CP12-509-000 and CP12-29-000**

Dear Director Turpin,

Pursuant to your letter dated June 30, 2022, Freeport LNG Development, L.P. (“Freeport”) must obtain written approval from FERC before restarting any non-emergency operations in existing facilities, constructing new or modified facilities, and commissioning and placing any facilities back into service. Having completed the repairs to its Export Facility on Quintana Island, Texas, and having performed other remedial actions as further set forth in our letter to you dated January 22, 2023, Freeport obtained FERC’s approval to commission its Loop 1 LNG transfer piping and reinstate its BOG management system on January 26, 2023. Thereafter, Freeport obtained additional approvals from FERC, including authorization to return LNG Loop 1 to service, including berthing and loading LNG vessels from Dock 1, and cooldown and restart of Train 3 (Unit 13). As FERC is aware, LNG Loop 1 (with Dock 1) has returned to full operations, berthing and loading an LNG ship on February 11, 2023. In addition, Train 3 has been safely restarted and is ready to transition to full, commercial operations and production of LNG. Further, Freeport has performed a full pre-startup safety review (PSSR) of Train 2 (Unit 12), identified and completed corrective work necessary to be able to safely restart the unit, and is ready to commence activities to restart Train 2 (beginning with re-inventorying Train 2 with refrigerants). Soon, we will perform a similar PSSR of Train 1 (Unit 11) and complete any necessary corrective work in order to position Train 1 to be safely restarted.

Given the foregoing, and in accordance with our PSSR and corrective work plans for Trains 2 and 1, Freeport respectfully requests authorization to progress to the full, commercial operations of Phase I. Phase I operation is comprised of the operation of all three LNG liquefaction trains (i.e., Trains 1, 2 and 3), two LNG storage tanks (i.e., Tanks 1 and 2) and one LNG loading dock (i.e., Dock 1). As you are aware, Tanks 1 and 2 have continued in operation throughout our recovery of the June 8<sup>th</sup> incident, safely maintaining LNG inventory that was within the facility at the time of the incident. Dock 1 and LNG Loop 1 have been fully reinstated and loaded an LNG vessel on February 11<sup>th</sup>. Train 3 has been fully and safely restarted and is ready to ramp up to full production rates. Train 2 has completed its PSSR and is ready to commence its restart, and Train 1 will follow along within the next few weeks. As you are aware, the LNG trains were not involved in the June 8<sup>th</sup> incident (and thus no restoration work was performed on those units). As such, restart of those trains does not entail the review or verification of any restoration work. Therefore, we would ask permission to commence the restart of Trains 1 and 2 once those trains have had their PSSR’s successfully completed, including the completion of all punchlist and



corrective work deemed necessary for the safe restart of those units.<sup>1</sup> Prior to restart of those units, Freeport will provide to FERC the completed PSSR documentation and a punchlist of remaining “C” and “E” work items that can be safely completed during unit operations.

Freeport notes that any authorization pursuant to this request will be limited to Phase I operations and will not extend to utilizing Loop 2 for LNG circulation, Dock 2 to perform loading activities<sup>2</sup>, or Tank 3 for the storage of LNG. Subsequent approvals will be necessary to fully reinstate Loop 2, Dock 2 and Tank 3 to perform the foregoing activities.

Given the close coordination that Freeport, PHMSA and FERC continue to maintain and the current status of our Train 3 operations, Freeport would greatly appreciate FERC’s response to this request today, if at all possible.

Respectfully,

*Mark W. Mallett*

Mark W. Mallett, P.E.  
Chief Operating Officer  
Freeport LNG Development, L.P.

cc: via email

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<sup>1</sup> This punchlist and corrective work are categorized as “A,” “B,” “C,” and “E” items, wherein all “A” and “B” items must be completed prior to restarting the unit. “C” and “E” items are corrective work activities that do not affect the safety or operational integrity of the unit and can be completed after restart of the unit.

<sup>2</sup> For avoidance of doubt, Dock 2 may be utilized as a lay berth for the temporary mooring of LNG vessels as further described in our letter to you dated February 13, 2023.