



**Dominion Energy Cove Point LNG, LP**  
707 East Main Street, Richmond, VA 23219

August 21, 2017

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: Dominion Energy Cove Point LNG, LP  
Cove Point Liquefaction Project  
CP13-113-000  
Request for Authorization to Introduce Hazardous Fluids**

Dear Secretary Bose:

By Order dated September 29, 2014, the Federal Energy Regulatory Commission (FERC or Commission) authorized Dominion Cove Point LNG, LP<sup>1</sup> (Cove Point or Dominion Energy) to construct and operate certain facilities that comprise the Cove Point Liquefaction Project (Project). *Dominion Cove Point LNG, LP*. 148 FERC ¶ 61,244 (the "Order").

On December 23, 2014, Cove Point submitted Volume Seventeen – Pre-Treatment Area (Accession Numbers 20141223-5324 and 20141223-5325), including information in accordance with Final Design Conditions 33, 34, 35, 37, 45, 48, 49, 52, 55, 56, 57 and 65. Notice to proceed with construction for the Pre-Treatment Area was issued on February 5, 2015.

On January 13, 2015, Cove Point submitted Volume Nineteen – Outside the Battery Limits (OSBL) Area (Accession Numbers 20150113-5087 and 20150113-5088), including information in accordance with Final Design Conditions 33, 34, 35, 37, 44, 45, 48, 49, 50, 52, 59 and 65. Notice to proceed with construction for the OSBL Area was issued on March 4, 2015.

On February 11, 2015, Cove Point submitted Volume Twenty – Liquefaction Area (Accession Numbers 20150211-5091 and 20150211-5092), including information in accordance with Final Design Conditions 33, 34, 35, 37, 44, 45, 48, 49, 52, 61, 62, 63 and 65. Notice to proceed with construction for the Liquefaction Area was issued on July 15, 2015.

In addition, Cove Point submitted supplemental information regarding Final Design Conditions 34, 35, 38, 39, 49, 52 and 65. Also, Cove Point has submitted information in accordance with Prior to Commissioning Conditions 67, 68, 70, 71 and 72.

The Liquefaction Facility has been integrated with the existing terminal consistently throughout the development of the Cove Point Liquefaction Project. This integration includes environmental policy and procedures, quality, safety, plant arrangements and engineering, and ranges from details such as tie-ins to overall issues such as hazard analysis. Operations procedures and logic have been developed to integrate the processes and procedures of the Liquefaction Facility with

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<sup>1</sup> On May 12, 2017 Dominion Cove Point LNG, LP changed its name to Dominion Energy Cove Point LNG, LP.

those of the existing terminal. The plant protection systems and control systems are integrated, as are plant utilities and power, and LNG send-out and storage. Cove Point is currently training its operations team with a plant operations simulator which integrates the controls of the existing terminal and the new Liquefaction Facility. Documentation of this integration has been submitted to FERC throughout the approval and implementation process of the Liquefaction Facility. See Attachment 1 for a table showing supplemental information previously submitted by Cove Point relevant to integration.

The Cove Point Liquefaction Project developed a new Emerson Delta V DCS that will be integrated into the existing plant DCS. Certain new Project components are integrated directly into the existing DCS given their location. All new and existing plant operations will be directed from the Main Control Room (MCR) through the integrated system.

The engineering work stations for the new operations controls system for the Cove Point Liquefaction Facility are set up in the MCR and a temporary location, which is near to but separate from the existing control room. This configuration is being used so that loop checking and verification of the new system network and equipment can proceed without distracting the operators in the existing MCR.

The new system received a Factory Acceptance Test (FAT) before leaving the factory, and received a Site Acceptance Test (SAT) after being installed at the Liquefaction Facility. The results of the FAT and SAT are included with this submission in Attachment 3. The existing control room will be used for operation of the new Liquefaction Facility and has been modified for this expanded role. The new system has been connected to the existing control room via an umbilical link. As commissioning begins, the equipment of the Liquefaction Facility will be run from the existing control room using the new operations controls system.

At this time, all equipment, instrumentation and valves related to the below listed areas have been completed and have been tagged in the field in accordance with Condition 69.

In addition, Cove Point hereby submits supplemental information related to the below listed areas in accordance with Conditions 73 and 74. Applicable firewater pump documentation along with applicable Software FAT Procedures, SIS Software FAT Plan, and Site Installation checklists were included in Attachments 2 and 3 of the Request for Introduction of Hazard Fluids filed on July 17, 2017 (Accession Number 20170717-5143 and 20170717-5144).

With this filing and pursuant to Conditions 11, 73 and 74, Cove Point hereby requests authorization to introduce hazardous fluids and perform related commissioning activities for the following:

- a. Feed gas (natural gas) to the Pre-Treatment and the Liquefaction Areas
- b. Equipment related to ship loading, including the LNG loading pumps and the return-gas blowers

and all supporting systems in those areas **on or before August 30, 2017.**

This submission contains the following documents:

- Attachment 1: Selected Integration Document Tables;
- Attachment 2: Condition 73 - Firewater Pump, Monitor and Hydrant Test Documentation (Contains Controlled Unclassified Information and Critical Energy Infrastructure Information – Do Not Release, Contains Privileged Information – Do Not Release, Not Available to Competitive Duty Personnel, and Proprietary, PROTECTED MATERIALS, Released Subject to Terms of Docket No. CP13-113 Protective Agreement); and
- Attachment 3: Condition 74 – FAT, SAT and SIT Test Documentation associated with the DCS and SIS (Contains Controlled Unclassified Information and Critical Energy Infrastructure Information – Do Not Release, Contains Privileged Information – Do Not Release, Not Available to Competitive Duty Personnel, and Proprietary, PROTECTED MATERIALS, Released Subject to Terms of Docket No. CP13-113 Protective Agreement).

Cove Point requests that, pursuant to 18 C.F.R. § 388.112 of the Commission's regulations, the information filed in Attachments 2 and 3 be treated as Controlled Unclassified Information (CUI) and Critical Energy Infrastructure Information (CEII), and that it not be released to the public. This information is customarily treated as CEII, and as such, is labeled "Contains Critical Energy Infrastructure Information – Do Not Release". Additionally, Attachments 2 and 3 contains proprietary information used by Cove Point and Cove Point's third party consultant that is customarily treated as privileged and confidential and disclosure of this information could result in commercial and competitive harm to Cove Point and its consultant. As such, the information is also labeled "Contains Privileged Information – Do Not Release", "Not Available to Competitive Duty Personnel", and "Proprietary". Cove Point believes that the CEII/Privileged information in these attachments is exempt from disclosure pursuant to Freedom of Information Act Exemption 4, 5 U.S.C. §552(b)(4), and should not be released.

Cove Point previously attached its Form of Protective Agreement on October 16, 2013 in Accession Number 20131016-5074 in accordance with Commission regulations. Notwithstanding, Cove Point reserves its right to file an objection to disclosure of the filed information pursuant to Section 388.112(b)(2)(iii) of the Commission's regulations.

Finally, Cove Point notes that when electronically filing information that is considered both CUI/CEII and Privileged, it can either eFile the information as CEII or as Privileged, but not as both. Accordingly, Cove Point has filed this information as Privileged, but has labeled the information as both CUI/CEII and Privileged.

If you have any questions, please contact me at 804-771-4796.

Respectfully submitted,

*/s/ Deborah T. Gholson*

Deborah T. Gholson  
Gas Transmission Certificates Program Manager

cc: Joanne Wachholder, FERC  
Ghanshyam Patel, FERC  
Service List

## **Attachment 1**

### **Selected Integration Document Tables**

## Attachment 1

Selected Integration Related Documents Filed with FERC

### **FEED GAS TO PRE-TREATMENT AND LIQUEFACTION**

<b>Order Condition</b>	<b>Description</b>	<b>Vol.</b>	<b>Att.</b>	<b>Date Filed</b>	<b>Date Approved</b>
29	Combustion/Ventilation Air Intake Equipment Technical review and Intake Gas Detectors for the existing buildings	2	V2-11	10/2/2014	10/29/2014
31	Existing ERP updated plan which applies to the entire facility	2	V2-12	10/2/2014	10/29/2014
36	Tie-In points, location tiles, P&IDs and Tie-in Procedure for connecting the main natural gas lines to the Pre-Treatment Area and Liquefaction Area	27	V27-1	4/13/2015	6/4/2015
40	Facility firewater plot plan and firewater protection monitors and hydrants and piping details	13 14	V13-3 V14-4	11/19/2014 12/1/2014	12/17/2014 1/30/2015
49	Fire and Gas Detectors and C&E Matrices for the Pre-Treatment Area and Liquefaction Area	14 17 20	V14-6 V17-7 V20-7	12/1/2014 12/23/2014 2/11/2015	1/30/2015 2/5/2015 7/15/2015
60	Existing Firewater system compatibility and reliability and firewater system tests	14	V14-7	12/1/2014	1/30/2015
67	Test procedures for plant utilities, fire protection and electrical distribution were included related to the Pre-Treatment Area and Liquefaction Area	N/A	1	12/27/2016	4/7/2017
71	HSE Management Plan and detailed safety procedures and list	N/A	1 2	3/13/2017	4/7/2017
72	Training Logs, IHK Contractual Training, Phase I Basic Operations Training, Phase II Basic Operations Training, Training & Self-study IHK Qualification Program for the Pre-Treatment Area and Liquefaction Area	N/A	3	3/13/2017	4/7/2017

## Attachment 1

Selected Integration Related Documents Filed with FERC

### **EQUIPMENT RELATED TO SHIP LOADING, INCLUDING THE LNG LOADING PUMPS AND THE RETURN-GAS BLOWERS**

<b>Order Condition</b>	<b>Description</b>	<b>Vol.</b>	<b>Att.</b>	<b>Date Filed</b>	<b>Date Approved</b>
29	Combustion/Ventilation Air Intake Equipment Technical review and Intake Gas Detectors for the existing buildings	2	V2-11	10/2/2014	10/29/2014
31	Existing ERP updated plan which applies to the entire facility	2	V2-12	10/2/2014	10/29/2014
36	Tie-In points, location tiles, P&IDs and Tie-in Procedure for equipment related to loading LNG onto ships, including the Return Gas Blowers	15 26 29 32	V15-1 V26-1 V29-1 V32-1	12/8/2014 3/26/2015 6/22/2015 8/28/2015	1/16/2015 6/4/2015 8/6/2015 10/9/2015
40	Facility firewater plot plan and firewater protection monitors and hydrants and piping details	13 14	V13-3 V14-4	11/19/2014 12/1/2014	12/17/2014 1/30/2015
49	C&E Matrices for the Fire and Gas Detectors and OSBL Areas	14 19	V14-6 V19-6	12/1/2014 1/13/2015	1/30/2015 3/4/2015
54	Drawings and Procedures for Modification of the South Tunnel expansion joints	7	V7-1 V7-2 V7-3	10/8/2014	11/7/2014
	Drawings and Procedures for Modification of the North Tunnel expansion joints	24	V24-1 V24-2 V24-3	3/13/2015	5/7/2015
60	Existing Firewater system compatibility and reliability and firewater system tests	14	V14-7	12/1/2014	1/30/2015
67	Test procedures for plant utilities, fire protection and electrical distribution were included related to the OSBL Areas	N/A	1	12/27/2016	4/7/2017
71	HSE Management Plan and detailed safety procedures and list	N/A	1 2	3/13/2017	4/7/2017
72	Training Logs, IHIK Contractual Training, Phase I Basic Operations Training, Phase II Basic Operations Training, Training & Self-study IHIK Qualification Program for the OSBL Areas	N/A	3	3/13/2017	4/7/2017

**Attachment 2**

**Condition 73**

**Firewater Pump, Monitor and Hydrant Test Documentation**

Contains Controlled Unclassified Information and Critical Energy Infrastructure Information – Do Not Release, Contains Privileged Information – Do Not Release, Not Available to Competitive Duty Personnel, and Proprietary, PROTECTED MATERIALS, Released Subject to Terms of Docket No. CP13-113 Protective Agreement

**(PROVIDED UNDER SEPARATE COVER)**



**Attachment 3**

**Condition 74**

**FAT, SAT and SIT Test Documentation associated with the DCS and SIS**

Contains Controlled Unclassified Information and Critical Energy Infrastructure Information – Do Not Release, Contains Privileged Information – Do Not Release, Not Available to Competitive Duty Personnel, and Proprietary, PROTECTED MATERIALS, Released Subject to Terms of Docket No. CP13-113 Protective Agreement

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