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October 1, 2019

The Honorable Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First St., N.E. Washington, D.C. 20426

> Re: National Grid LNG LLC, Docket No. CP16-121-000 Fields Point Liquefaction Project Monthly Status Report for September 2019

Dear Secretary Bose:

On October 17, 2018, the Commission issued the Order Issuing Certificate ("Certificate Order") granting a certificate of public convenience and necessity to National Grid LNG LLC ("National Grid") in the above captioned docket for the Fields Point Liquefaction Project (the "Project"). *National Grid LNG LLC*, 165 FERC ¶ 61,031 (2018). National Grid filed its acceptance of the certificate of public convenience and necessity on October 29, 2018 and the Implementation Plan was filed on November 1, 2018.

As required by Environmental Condition 8 of the Certificate Order, National Grid is submitting the Monthly Status Report for the September 2019 reporting period. If you have any questions about this submission, please contact me at 781-392-6640.

Respectfully submitted,

<u>|s| Patrick A. Chaney</u>

Patrick A. Chaney Lead Project Manager – New England LNG Capital Delivery, Gas – Complex Project Management <u>Patrick.Chaney@nationalgrid.com</u>

cc: Service List

### MONTHLY STATUS REPORT FOR SEPTEMBER 2019

On October 17, 2018, the Commission issued the Order Issuing Certificate ("Certificate Order") issuing a certificate of public convenience and necessity to National Grid LNG LLC ("NGLNG") in Docket No. CP16-121-000 for the Fields Point Liquefaction Project (the "Project"). *National Grid LNG LLC*, 165 FERC ¶ 61,031 (2018). Pursuant to Environmental Condition No. 8 of the Certificate Order, NGLNG provides its monthly status report for the month of September 2019.

#### Update on Federal Authorizations

As previously reported in the report for December 2018, all required Federal authorizations have been received.

#### Project Schedule – Construction Status and Work Planned

Work Accomplished in September:

- 1. Air monitoring in accordance with the approved Rhode Island Department of Environmental Management Short Term Response Action Plan is ongoing and continued throughout the month of September 2019.
- 2. Training in the Environmental Inspector's ("EI") duties continues and will be ongoing for all new personnel for the full duration of the Project on a weekly basis and/or as needed. Nine trainings were provided during the month. Attendees included National Grid employees, Kiewit employees, and site workers and supervisory personnel.
- 3. Completed driving 16" precast piles in areas D, M, and partially complete for L.
- 4. Installing micro-piles inside berm.
- 5. Completed install of slope stability load relieving platform and tensar wall to elevation 15.
- 6. Partially completed install of ductbank from existing plant to area I.

Work Planned for October:

- **1.** Complete micropile inside berm.
- **2.** Begin micropiling for compressor building foundation.
- **3.** Begin cut-off of 16" precast piles.
- **4.** Backfill to bottom of foundation for compressor building and piperack.

## Problems Encountered and/or Instances of Non-Compliance and Corrective Actions

The problems encountered, contractor nonconformance/ deficiency logs, and each instance of noncompliance observed by the EI during this reporting period are shown below along with the corrective and remedial actions taken and the effectiveness of the implemented actions.

	Problems a	and Noncomplia	ince	
Date	Problem/Noncompliance	Remedial Action Taken	Date of Corrective Action	Effectiveness of Corrective Action
09/04/2019	Two silt sacks to be cleaned.	Silt sacks cleaned.	09/04/2019	Effective, restored drainage of storm water.
09/04/2019	Crushed stone tracking pad at exit of work zone requires maintenance.	Pad roughened.	09/04/2019	Effective, restored tracking pad.
09/06/2019	Clean Filtrexx soxx at duct bank excavation.	Filtrexx soxx cleaned.	09/06/2019	Effective, erosion controls restored.
09/11/2019	Crushed stone tracking pad at exit of work zone requires maintenance.	Pad roughened.	09/12/2019	Effective, restored tracking pad.
09/18/2019	Crushed stone tracking pad at exit of work zone requires maintenance.	Pad roughened.	09/19/2019	Effective, restored tracking pad.
09/18/2019	Secondary containment in micro-pile area needs to be adjusted.	Adjustments made to secondary containment.	09/20/2019	Effective, secondary containment restored.
09/18/2019	Filtrexx Soxx needs to be installed in area of Duct bank work.	Filtrexx Soxx installed.	09/18/2019	Effective, erosion controls installed.
09/24/2018	Crushed stone tracking pad at exit of work zone requires maintenance.	Pad roughened.	09/25/2019	Effective, restored tracking pad.
09/24/2019	Oil sheen in secondary containment.	Containment pumped out and containerized.	09/25/2019	Effective, secondary containment restored.
09/26/2019	Crushed stone tracking pad at exit of work zone requires maintenance.	Pad roughened.	09/30/2019	Effective, restored tracking pad.
09/26/2019	Oil sheen in secondary containment.	Containment pumped out and containerized.	09/27/2019	Effective, secondary containment restored.
09/26/2019	Filtrexx soxx at pile driving area should be replaced or repaired.	Filtrexx Soxx replaced.	09/30/2019	Effective, erosion controls restored.

Releases								
	Material and Quantity			Corrective Action				
Date	Released	Cause	Description	Taken				
None for this period								

#### Landowner/Resident Complaints

None during this period.

#### Correspondence Received From Other Agencies Concerning Noncompliance

No correspondence was received concerning instances of noncompliance from other federal, state, or local permitting agencies.

#### Special Inspector's Report

Construction Activities Observed during the reporting period:

- Installation of 16-inch precast concrete piles for foundation support.
- Excavation of obstructions encountered while driving 16-inch precast concrete piles.
- Construction of micropiles within the LNG storage tank containment dike.
- Completed installation of gabion baskets and rip rap in baskets for gabion basket wall.
- Installation of the stone transfer pad for Tensar MSE wall.
- Began backfilling MSE wall with dense grade aggregate and began placing filter fabric and geogrid at specified elevations.

Discrepancies reported to Contractors:

 While driving 16-inch precast concrete piles, the Contractor encountered shallow obstructions. The Contractor excavated to determine the obstruction to be existing foundations and submitted a change of driven precast piles to micropiles through the RFI process.

Uncorrected discrepancies reported to Engineer of Record:

- Several 16-inch precast concrete piles were surveyed more than three inches from the proposed location due to possible obstruction causing the pile to walk while hammering. The Contractor will submit an NCR once survey data has been collected for the pile area.
- One driven 16-inch precast concrete pile exhibited horizontal cracks at depths 12 to 15 feet on the pile. The EOR was notified and accepted the pile once it was driven to full depth. The Contractor will submit an NCR.

Outstanding NCRs:

See Attached Register

All work requiring special inspection was, to the best of my knowledge, in conformance with the approved plans and specifications and the applicable workmanship provisions.

Yes

No

See discrepancies list above

Kristian Theriault Special Inspector September 30, 2019 Date ATTACHMENT

#### NON-CONFORMANCE REGISTER - For the registration of NCR Reports

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Project	#:	90000130901		Project Name:	Field Point Liquefa	action Project	Providence, R	I	
	OSSQ	Engineering	Procurement	Construction	Quality	#NAME?	Material Management	Total Issued	
Percentage of Total	5%	20%	35%	5%	5%	25%	5%	100%	
Count by Discipline	1	4	7	1	1	5	1	20	
NCR Ref:	Audit Ref:	Issue Date		NCR Ag Description		Date of Agreed Disposition	Date of Closure	Probable Cause 1	Discipline
SR010-RPT-001	N/A	6/11/2019		ontract section 3.20.6 states the Contractor shall be esponsible to store, protect and maintain all equipment.				Vendor	Procurement
SR010-RPT-001A r1	N/A	6/11/2019	Incorrect paint applie addressed by Kiewit	ed on vessels at GCAW was not properly with a NCR per Section 18 of the QMS r3				Vendor	Vendor
SR010-RPT-002	N/A	6/23/2019		Section 12.0 of the Kiewit QMS requires all documents that are eplaced to be stamped as voided or superseded				Engineering	Engineering
SR010-RPT-003	N/A	6/23/2019	National Grid requested Kiewit to provide (2) RT film packages for audit purposes related to the GCAW Adsorber PO. These documents were not provided after several requests spanning a (6) week period					Procurement	Vendor
SR010-RPT-004	N/A	7/1/2019	changing the location of the load cells for the Micro Pile testing		Changes to specifications shall be documented utilizing a RFI or other approved written procedure	9/9/2019	9/9/2019	Contractor	Construction
SR010-RPT-005	N/A	7/3/2019	Piping specifications showed the incorrect NFPA-59A specification. The piping specification showed the 2019 version versus the 2001 version.					Engineering	Engineering
SR010-RPT-006	N/A	7/30/2019	Kiewit's Procurement Plan requires non-conforming materials received to be placed in a Quarantine area and/or marked as do not use.					Contractor	Material Management
SR010-RPT-007	N/A	8/2/2019	Kiewit did not notify I Feed Gas Booster C	National Grid for the off-site testing of the ompressor				Procurement	Quality

NCR Ref:	Audit Ref:	Issue Date	NCR Description	Agreed NCR Corrective Action	Date of Agreed Disposition	Date of Closure	Probable Cause 1	Discipline
SR010-RPT-008	N/A	8/2/2019	Incorrect hydro test pressure and hold time for firewater line. Test was not conducted in accordance with NFPA 24.				Engineering	Engineering
SR010-RPT-009	N/A	8/5/2019	Kiewit is required to notify National Grid per the Master ITP on Hold and Witness points. NG was not notified for the First Shipment of Piping Fabrication				OSSQ	Procurement
SR010-RPT-010	N/A	8/8/2019	Kiewit is required to provide the off-site vendors with the requirements of the contract between National Grid LNG LLC and Kiewit Power Constructors Co. Section 3.10 Welding Requirements was not conveyed to ABB for off-site construction.				Procurement	Procurement
SR010-RPT-011	N/A	8/8/2019	Section 3.21.23 Document Management and Control states the Contractor shall provide a fully functional, integrated, electronic data and document management system.				Contractor	Engineering
SR010-RPT-012	N/A	8/14/2019	Section 7.2 Procurement Strategy of the prime Contract requires a Supplier shipment to be inspected by the Contractor to ensure compliance with Project Specifications. The first shipment for the UG piping did not receive a final release shipment				OSSQ	Procurement
SR010-RPT-013 R1	N/A	8/20/2019	Prime Contract Attachment 7 requires APCI to comply with NFPA 59A. A data review of the quality documents noted the actual NDE performed was not in compliance with the NFPA 59A requirements. A review of documentation for the Cross over Bridge piping did not reflect this requirement				Vendor	Vendor
SR010-RPT-014	N/A	8/20/2019	Prime Contract Section 3.10 Scope of Work requires all procedures for welding of piping, vessels and equipment performed off-site shall be submitted to the Owner for review and approval prior to construction.				Vendor	Vendor
SR010-RPT-015 R1	N/A	8/20/2019	Prime Contract Attachment 7 requires APCI to comply with NFPA 59A. A data review of the quality documents noted the actual NDE performed was not in compliance with the NFPA 59A requirements. A review of documentation for the Cold Box piping did not reflect this requirement				Vendor	Vendor

NCR Ref:	Audit Ref:	Issue Date	NCR Description	Agreed NCR Corrective Action	Date of Agreed Disposition	Date of Closure	Probable Cause 1	Discipline
SR010-RPT-016	N/A	8/27/2019	UOP/GCAW equipment data books were reviewed by National Grid and found to be non-compliant with contract requirements				Vendor	Procurement
SR010-RPT-017	N/A	8/28/2019	UOP/Fabsco equipment data books were reviewed by National Grid and found to be non-compliant with contract requirements				Vendor	Procurement
SR010-RPT-018	N/A		Kiewit Site Specific Procurement Plan requires all contracts with risk level of 4 or 5 to conduct kick-off meetings upon execution of the contact.				Procurement	Procurement
SR010-RPT-019	N/A	9/23/2019	Kiewit Site Specific Procurement Plan requires development of a Master ITP Plan including Witness and Hold Points, FAT Test, quality audits and any additional recommended in-process shop inspection. These activities shall include dates.				Procurement	OSSQ

NCR No.	Description	Type (Internal / Supplier / Client)	Kiewit Disposition & Required Actions	Recommended Preventative Actions	Date Issued	Date Disposition Approved	n Date Closed
0001	Concrete Driven Pile DP-13 hit an obstruction and shifted during operation and causing pile to be approximately 2.4744" out of tolerance per specification at 6"	Kiewit	Use-As-Is EOR approval for out of tolerance per specification	No action to be taken	5/28/2019	6/26/2019	6/26/2019
0002	Damage to upper concrete driven pile DP-70 during pile driving activities, damage is just above the Emeca splice plate, resulting in exposed rebar and a 2' crack protruding up the south east side of the column, extending from the break.	Kiewit	Rework or Scrap EOR to determine action to be taken per specification 102761-B- STR-SPC-0006 section 4.5.4.1.12	EOR to notify Quality of resolution	6/6/2019	8/13/2019	8/13/2019
0003	During installation of DP 113 the toe of the pile started to walk to the west. Crew attempted to correct the out of plumbness during driving but could not correct enough to get back in tolerance. As the pile sits now it is 1 3/8" in 4' equating to 2.86% or .86% out of tolerance.	Kiewit	Rework Rejected piles shall be corrected as directed by the engineer of record.		6/11/2019	6/26/2019	6/26/2019
0004	Regeneration Gas Seperator LDD-1011 was found to have an incorrect coating applied in accordance w/ 102761-B-STR-SPC- 0003. The original coating was specified as Sherwin-Williams Heat-Flex, Hi-Temp 1200 degree Fahrenheit system. The coatings found to be applied are Sherwin-Williams Macropoxy 646 (Interm.) and Acrolon 218 HS (Finish) 200 degree Fahrenheit system.	Kiewit	Rework Blast incorrect coating and recoat with approved coating system per specification 102761-B-MEC-SPC-0070	Being knowledgeable of specification and verify current drawings before proceeding with any installation and applications of materials.	5/16/2019	6/14/2019	
0005	Adsober L-1000A was found to have an incorrect coating applied in accordance w/ 102761-B-STR-SPC-0003. The original coating was specified as Sherwin-Williams Heat-Flex, Hi-Temp 1200 degree Fahrenheit system. The coatings found to be applied are Sherwin-Williams Macropoxy 646 (Interm.) and Acrolon 218 HS (Finish) 200 degree Fahrenheit system.	Kiewit	Rework Blast incorrect coating and recoat with approved coating system per specification 102761-B-MEC-SPC-0070	Being knowledgeable of specification and verify current drawings before proceeding with any installation and applications of materials.	5/16/2019	6/14/2019	
0006	Adsober L-1000B was found to have an incorrect coating applied in accordance w/ 102761-B-STR-SPC-0003. The original coating was specified as Sherwin-Williams Heat-Flex, Hi-Temp 1200 degree Fahrenheit system. The coatings found to be applied are Sherwin-Williams Macropoxy 646 (Interm.) and Acrolon 218 HS (Finish) 200 degree Fahrenheit system.	Kiewit	Rework Blast incorrect coating and recoat with approved coating system per specification 102761-B-MEC-SPC-0070	Being knowledgeable of specification and verify current drawings before proceeding with any installation and applications of materials.	5/16/2019	6/14/2019	
0007	Adsober L-1000C was found to have an incorrect coating applied in accordance w/ 102761-B-STR-SPC-0003. The original coating was specified as Sherwin-Williams Heat-Flex, Hi-Temp 1200 degree Fahrenheit system. The coatings found to be applied are Sherwin-Williams Macropoxy 646 (Interm.) and Acrolon 218 HS (Finish) 200 degree Fahrenheit system.	Kiewit	Rework Blast incorrect coating and recoat with approved coating system per specification 102761-B-MEC-SPC-0070	Being knowledgeable of specification and verify current drawings before proceeding with any installation and applications of materials.	5/16/2019	6/14/2019	
0008	Particle Filter LDS - 1010 A, was found to have an incorrect coating applied in accordance w/ 102761-B-STR-SPC-0003. The original coating was specified as Sherwin-Williams Heat-Flex, Hi-Temp 1000 degree Fahrenheit system. The coatings found to be applied are Sherwin-Williams Macropoxy 646 (Interm.) and Acrolon 218 HS (Finish) 200 degree Fahrenheit system.	Kiewit	Rework Blast incorrect coating and recoat with approved coating system per specification 102761-B-MEC-SPC-0070	Being knowledgeable of specification and verify current drawings before proceeding with any installation and applications of materials.	5/22/2019	Rejected	
0009	Particle Filter LDS - 1010 B, was found to have an incorrect coating applied in accordance w/ 102761-B-STR-SPC-0003. The original coating was specified as Sherwin-Williams Heat-Flex, Hi-Temp 1000 degree Fahrenheit system. The coatings found to be applied are Sherwin-Williams Macropoxy 646 (Interm.) and Acrolon 218 HS (Finish) 200 degree Fahrenheit system.	Kiewit	Rework Blast incorrect coating and recoat with approved coating system per specification 102761-B-MEC-SPC-0070	Being knowledgeable of specification and verify current drawings before proceeding with any installation and applications of materials.	5/22/2019	Rejected	
0010	Failure to meet pressure testing requirements as outlined in specification NFPA 59A 2001 Edition	Kiewit	Rework Testing plan shall be developed to provide re-testing at Barnhart Hake facility including pressure testing procedure to require 1.25 X MAWP, equipment mobilization manpower and safety plan and PPE to be used. See attached letter and instructions.	To be provided by APCI	6/18/2019	6/18/2019	
0011	Companders K-The equipment maintenance and preservation for the Companders 1CS-V200 as required by Air Products and Chemicals, INC. was not followed and properly documented. Request have been previously made to produce verifiable documentation that would support proper maintenance and preservation activities during the period of January of 2018 through the date of this NCR. Specific requirements in accordance with FPLP-APCI Compander Storage Procedure and CryoMachinery Preservation Checklist Installation through start-up CMD-0177d Ref. CMD-0177a & CMD-0177b have not been followed and subsequently documented.210 & K-220	Kiewit	Rework Consultation with equipment manufacturer and owner to determine inspection steps that would identify any potential equipment damage.	Follow Written procedures	6/19/2019		
0012	The equipment maintenance and preservation for the K-131 Nitrogen Recycle Compressors as required by Air Products and Chemicals INC. was not followed and properly documented. Request have been previously made to produce verifiable documentation that would support proper maintenance and preservation activities during the period of January of 2018 through the date of this NCR.	Kiewit	Rework Consultation with equipment manufacturer and owner to determine inspection steps that would identify any potential equipment damage.	Follow Written procedures	6/19/2019		
0013	The equipment maintenance and preservation for Air Cooled Heat Exchangers E-2131, E-2141, E-2151, & E-2135 required by Air Products and Chemicals INC. was not followed and properly documented. Request have been previously made to produce verifiable documentation that would support proper maintenance and preservation activities during the period of January of 2018 through the date of this NCR		Rework Consultation with equipment manufacturer and owner to determine inspection steps that would identify any potential equipment damage.	Follow Written procedures	6/19/2019		
0014	As Kiewit was cutting off piles to elevation the first, two or three feet, voids in top of concrete piles were discovered on two separate piles with numbers mentioned in the Reference Documentation above.	Kiewit	Repair Repair to Standard - Recommend using Sikadur 42, Grout-pak Pt, per manufatures recommendations to fill voids.	Kiewit's Concrete Engineer is communicating to Oldcastle (Supplier) to remedy the cause and ensure voids don't occur again. Oldcastle will be doing a training with their staff.	8/27/2019	9/10/2019	9/11/2019
0015	Pile iniatally inspected and there were no cracks. We started driving the top piece and noticed the crack. The crack went down about 20' and the corner of the pile chipped off 20' down. Once pile chipped we continued driving to grade.	Kiewit	Scrap Drive another pile within 28" (center to center) in any dircetion of the pile that cracked.	Unknown. We believe it was a flaw with the concrete that was not visible to the naked eye.	6/27/2019	7/8/2019	7/8/2019
0016	14" Pre-Cast Pile were cut off short by 2 inches to 3 inches out of Tolerance. Specification Cut-off tolerance shall be within 1 inch of the required elevation shown in the contract documents.	Kiewit	Use-As-Is Propose when performing the back filling and installing the Tensar wall that we do one 12 inch lift, one 9 inch lift and one 6 inch lift this would bring us back to design elevation.	To prevent from recurrence Control Point (3rd party surveyor) are shooting in bench marks then by using a laser level laying out the cut lines.	7/10/2019	7/15/2019	9/11/2019