



U.S. Department
of Transportation

**Pipeline and Hazardous Materials
Safety Administration**

901 Locust Street, Suite 462
Kansas City, Missouri 64106-2641

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 20, 2015

Mr. Tom Martin
President, Natural Gas Pipelines
Kinder Morgan, Inc.
1001 Louisiana Street, Suite 1000
Houston, Texas 77002

CPF 3-2015-1006W

Dear Mr. Martin:

On August 20-22 and November 5-7, 2013, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code inspected the implementation of your gas integrity management program in Houston, Texas, and records and field operations in Joliet, Illinois, respectively.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

§192.709(c) Transmission lines: Record keeping.

Each operator shall maintain the following records for transmission lines for the periods specified:

(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.

During the inspection of Natural Gas Pipeline of America, it was determined that set points "as found" and "as left" were not documented for certain pressure limiting and regulating stations inspections in 2011 and 2012. Specifically, inspection records reviewed revealed that six (6) inspections did not list the "as left" pressure and four (4) inspections did not list the "as found" or "as left" pressures.

During the inspection, it was also determined that partial operation of valves was not documented in eighty-six (86) valve inspection records that occurred between 2010 and 2012.

Under 49 United States Code, §60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 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 item(s) identified in this letter. Failure to do so will result in Natural Gas Pipeline of America 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 3-2015-1006W**. 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,



Allan C. Beshore
Director, Central Region OPS
Pipeline and Hazardous Materials Safety Administration

cc: Mr. Gary Buchler
Vice President Engineering/Operations
Natural Gas Pipeline Co of America (KMI)
1001 Louisiana Street
Houston, Texas 77002