



Tennessee Gas Pipeline
Company, L.L.C.
a Kinder Morgan company

June 23, 2021

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Attn: James A. Urisko
Director, Office of Pipeline Safety
PHMSA Southern Region
230 Peachtree Street N.W., Suite 2100
Atlanta, GA 30303

Re: CPF 2-2021-002-NOPV

Dear Mr. Urisko:

Tennessee Gas Pipeline Company, L.L.C. (TGP) acknowledges receipt of PHMSA's referenced Notice of Proposed Violation and Proposed Compliance Order and responds as follows.

1. § 192.631 - Control room management.

(a) ...

(d) *Fatigue mitigation.* Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined:

(1) Establish shift lengths and schedule rotations that provide controllers off-duty time sufficient to achieve eight hours of continuous sleep;

TGP failed to comply with the regulations because it did not take measures to ensure that it established shift lengths and schedule rotations that provide controllers off-duty time sufficient to achieve eight hour of continuous sleep.

During PHMSA's inspection, TGP personnel stated the average commute time from the controller's residence to and from the control room is only checked at the time of controller(s) hiring, and the commute time is not checked or reconfirmed subsequent to the initial hiring.

By establishing shift lengths and schedule rotations without verification of each controller's current or up-to-date commute time, TGP has no assurance that the shift lengths or schedule rotations assigned to its controllers provide adequate off-duty time to achieve eight hours of continuous sleep.

James A. Urisko
June 23, 2021
Page 2



Tennessee Gas Pipeline
Company, L.L.C.
a Kinder Morgan company

Response: TGP agrees to implement the proposed compliance order that accompanies this alleged violation, including determining current typical commute times for controllers and amending procedures, within 90 days of receipt of the Final Order.

TGP is fully committed to pipeline safety and proper control room management and appreciates the opportunity to respond to this Notice of Proposed Violation. Please contact me by phone (713-420-5229) or email (rob_perkins@kindermorgan.com) should you have any questions or concerns about TGP's response.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Perkins".

Rob Perkins
Vice President, Gas Control

/kh