



April 25, 2023

Dustin Hubbard,
Director, Western Region
Office of Pipeline Safety Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

Re: PHMSA Notice of Proposed Violation and Proposed Compliance Order – SFPP Response CPF 5-2022-030-WL

Dear Director Hubbard:

On April 17, 2023, Kinder Morgan, Inc. received a Notice of Proposed Violation (NOPV), written by Arizona Corporation Commission, Office of Pipeline Safety (AZOPS), on behalf of the Pipeline and Hazardous Materials Safety Administration (PHMSA) as a result of an inspection on the Santa Fe Pacific Pipeline LP (SFPP) from Phoenix, Arizona to the New Mexico state line, as well as the terminal in Phoenix, Arizona from October 25, 2022 through October 28, 2022. PHMSA alleges that SFPP had a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR) as follows:

1. **§ 195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (a) **Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.**

SFPP failed to follow its procedural manual for operations, maintenance, and emergencies L-O&M 1403 (O&M), Specifications – Flanges, Flange Bolts & Gaskets, Section 3.6.2, which required that two nuts be completely engaged on a threaded bolt (stud) and that the bolt threads extend a minimum of 1.5 threads past the nut.² At the time of the inspection, AZOPS, acting as an agent of PHMSA, observed and photographed flange joints at the inlet of jurisdictional tank T2 A-1 and T5 A-1 at the Tucson terminal, which had nuts that were not fully engaged with the threads, and the bolt threads did not extend a minimum of 1.5 threads past the nut pursuant to SFPP's written procedures.³

SFPP Response: Subsequent to the AZ-SCC inspection SFPP replaced the bolts included in the above referenced NOPV (see attached photos). This should close out the NOPV and PCO and be considered complete.

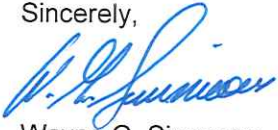
SFPP is committed to operating our pipeline systems safely and in compliance with all applicable regulations. Should you have any questions or concerns regarding this response, please call Jaime Hernandez at 713-369-9443 or me at 713-369-6330.

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Sincerely,



Wayne G. Simmons
Chief Operating Officer - Products Pipeline

Cc: Jaime A. Hernandez, Director, Codes and Standards, Operations Support Group

Encls.