



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

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January 15, 2014

Mr. Byron Coy
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
820 Bear Tavern Road, Suite 103
West Trenton, New Jersey 08628

**Re: Warning Letter
CPF 1-2013-1035W**

Dear Mr. Coy:

Tennessee Gas Pipeline Company ("TGP") is in receipt of the above referenced Warning Letter, dated December 9, 2013. The letter refers to an item of probable violation of the Pipeline Safety Regulations in 49 CFR 192. TGP offers a response to this item below.

Your original letter was addressed to Mr. Dwayne Burton, Vice President Engineering/Operations. Please note that all future correspondence regarding such matters should be addressed as follows:

Kimberly S. Watson
President – Gas Pipelines
Kinder Morgan Inc.
1001 Louisiana Street, Suite 1000
Houston, Texas 77002

PHMSA Finding

192.603 General provisions.

.... (b) Each operator shall keep records necessary to administer the procedures established under 192.605.

Tennessee Gas Pipeline (TGP) failed to keep records necessary to administer the procedures established under 192.605. Specifically, TGP failed to produce documentation for two monthly inspections (September and October 2011) for the odorant injector located at TGP station 321 in Pennsylvania.

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The odorant injection at TGP station 321 in Pennsylvania is tied into the TGP 300 pipeline that crosses into Westchester County, NY, and feeds into Consolidated Edison at the White Plains, NY gate station. The missing records were discovered during the NYSDPS review of TGP records.

TGP Response

The NYSDPS inspector was provided monthly odorant testing records through August 2011 in accordance with prevailing company procedures. These procedures were changed in the August/September time frame to begin requiring quarterly odorization testing. TGP does indeed keep records necessary to administer the procedures established under 192.605 and has records for the quarterly tests for October 2011 and January 2012. These records are provided herewith and are attached.

Following TGP's acquisition by Kinder Morgan Inc., TGP began using the Kinder Morgan procedures for odorization testing and reverted back to monthly testing which continues at the present time.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

Gary M. Buchler
Vice President – Engineering/Operations

Attachment

Bcc: Reji George
Ron Bessette
Brett Metzger
Merlin Moseman
Ken Peters



El Paso Corporation

1001 Louisiana Street Houston, TX 77002 713.420.2600

Completed Work Orders (M1540-WO)

Date: 1/9/2014

Site: TGP Division: 10 Geoloc: D321-STA-321% Description: % Analyzer% Beginning Date: 10/1/2011 End Date: 2/1/2012

| Geographic Location | WO Number | Description | Status | Completion Date | Responsible Person | Completed By | Closed By | Remarks |
|---------------------|------------|---|--------|-----------------|--------------------|--------------|-----------|---|
| D321-STA-321 | 11-5835266 | Quarterly Test - Sulfur Analyzer - Station 321 | CLOSE | 01/31/2012 | JLH0401 | JLH0401 | JSW5193 | |
| D321-STA-321 | 11-4212891 | Quarterly Test - Sulphur Analyzer - Station 321 | CLOSE | 10/20/2011 | RTN3803 | JSW5193 | JSW5193 | test performed by Galvanic Applied Sciences representative on 10/20/11 |
| D321-STA-321 | 11-5502101 | Troubleshoot 842 DI Sulfur analyzer Station 321 | CLOSE | 11/23/2011 | JLH0401 | JLH0401 | JSW5193 | Trouble-shot and adjusted voltages, dip switches and sample flows. Also ran calibration and multiple reference streams to verify repeatability. |