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

RECEIVED APR 18 2018

April 12, 2018

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
609-771-7800

Re: Response to CPF 1-2018-1004M - Notice of Amendment (NOA) to Tennessee Gas Pipeline Company, L.L.C. and Closure Request

Dear Mr. Burrough,

Tennessee Gas Pipeline Company, L.L.C. (TGP) submits this Response to the NOA referenced above, including the submission of a copy of the amended Kinder Morgan Construction Standard, and requests that upon completion of your review that the final order reflects the closure of this NOA based on the following response.

From August 1-3, 2017 and August 29-31, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of CFR 49 United States Code, inspected the Tennessee Gas Pipeline Company's CT Expansion Project – MA Loop in Agawam, MA.

On the basis of the inspection, PHMSA identified the apparent inadequacy found within Tennessee Gas Pipeline Company's plans or procedures, as described below:

For the purposes of clarity, Tennessee Gas Pipeline, L.L.C. (TGP) is repeating the apparent inadequacy noted by your office with the TGP response immediately following in bold font:

Item Number 1:

§192.303 Compliance with specifications or standards

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

Tennessee Gas Pipeline Company's (TGP) written construction standards for each transmission line constructed in accordance with Part 192 were inadequate. Specifically, TGP's construction standards for pipe coating did not adequately address minimizing damage to pipe coating during installation via boring, per the requirements of §192.461(e).

Section 192.461(e) states:

"If coated pipe is installed by boring, driving, or other similar method, precautions must be taken to minimize damage to the coating during installation."

During the inspection, the PHMSA inspector requested procedures addressing coating conditions of a pipeline when it is pulled out of the bore during horizontal directional drilling (HDD). TGP provided Construction Standards Section C1080, Below-grade or Submerged Pipe Coatings, revised 2017-02-01 (construction standards). However, the construction

standards did not address how TGP will assess the coating condition of piping that is exposed during a pull-back in the HDD process, and how TGP will remediate if the coating is damaged.

Therefore, TGP's construction standards did not adequately address minimizing damage to pipe coating during installation via boring, per the requirement of §192.461(e).

TGP Response to Item Number 1:

Since the original issuance of the NOA, TGP personnel and PHMSA Eastern Region staff have been coordinating a revision of Construction Standard Section C1080, Below-grade or Submerged Pipe Coatings. Based on PHMSA Eastern Region staff review, TGP amended the Construction Standard, effective April 12, 2018. The Construction Standard C1080 amendment can be seen in the highlighted section of the attachment.

With the procedure revisions noted, TGP believes that the alleged inadequacy referenced in the NOA has been satisfactorily addressed. Upon completion of your review of this document, TGP is requesting notification of closure of this NOA.

Please contact Jaime Hernandez at 713-369-9443 or me at 713-369-9232 should you wish to discuss the information provided above.

Sincerely,

Jorge Torres
Vice President of Engineering
Kinder Morgan Natural Gas Division

cc: Kenneth Grubb, Chief Operating Officer, Natural Gas Pipelines
Jorge Torres, Vice President, Engineering
Jaime Hernandez, Director - Engineering, Compliance / Codes and Standards

Attachment: Construction Standard Section C1080 – Below-grade or Submerged Pipe Coatings (revised)