

Natural Gas Pipeline Company
of America LLC

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KM

January 29, 2020

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: Response to CPF 1-2020-1006M – Notice of Amendment (NOA) to Natural Gas Pipeline Company of America LLC and Closure Request

Dear Mr. Burrough:

Natural Gas Pipeline Company of America LLC (NGPL) submits this Response to the NOA referenced above, including the submission of a copy of the amended Kinder Morgan (KM) O&M Procedure, 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 6 – 8, 2019, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) inspected Natural Gas Pipeline Company of America LLC's (NGPL) Cairo Storage Fields and its Underground Gas Storage Facility (UNGS) Program in Columbus City, IA. On the basis of the inspection, PHMSA alleged an inadequacy found within NGPL's plans or procedures, as described below.

KM has revised its O&M Procedure 2633 – Annulus Monitoring to address PHMSA's concern. This revision was previously shared with PHMSA's Eastern Region staff for their review. The amended O&M Procedure 2633 is the final version, has been approved by the Company stakeholders, and will formally go through the Company's implementation process for procedural changes and will be effective on March 1, 2020.

For the purposes of clarity, NGPL is repeating the apparent inadequacy noted by your office with the NGPL response immediately following:

Item Number 1:

§ 192.12 Underground natural gas storage facilities.

(a)

(e) **Operators of underground gas storage facilities must establish and follow written procedures for operations, maintenance, and emergencies implementing the requirements of API RP 1170 and API RP 1171, as required under this section, including the effective dates as applicable, and incorporate such procedures into their written procedures for operations, maintenance, and emergencies established pursuant to § 192.605.**

NGPL's written procedures for implementing the requirements of API RP 1171 were inadequate. Specifically, NGPL failed to establish procedures to evaluate any annular gas occurrence that exceeds its established threshold in accordance with

API RP 1171, Section 9.3.2 Well Integrity Monitoring.

Section 9.3.2 states in part:

The operator shall monitor for presence of annular gas by measuring and recording annular pressure and/or annular gas flow. The operator shall evaluate each annular gas occurrence that exceeds operator – or regulatory-defined threshold levels determined from well integrity evaluation and from risk assessment.

At the time of the inspection, NGPL procedures failed to address the requirement of API RP 1171, Section 9.3.2, for evaluating each annular gas occurrence that exceeds operator defined thresholds. In addition, it was noted that NGPL had established thresholds that exceeded the MAOP of the storage field.

NGPL Response to Item Number 1:

NGPL has revised its O&M Procedure 2633 – Annulus Monitoring to address PHMSA's concern. The O&M procedure amendment responsive to Item Number 1 is new Subsections 3.4.5 and 3.7.2(C) and is highlighted yellow on pages 3 and 4 of the attached amended O&M Procedure 2633.

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

Please contact Jaime Hernandez at 713-369-9443 or jaime_hernandez@kindermorgan.com or me at 713-369-8763 or kenneth_grubb@kindermorgan.com should you wish to discuss the information provided above.

Sincerely,



Kenneth W. Grubb
Chief Operating Officer, Gas Pipelines

cc: Jorge Torres, Vice President, Engineering
Anders Johnson, Vice President of Storage
Jaime Hernandez, Director of Engineering, Compliance/Codes and Standards
Eric Gentles, Manager Engineering

Attachment: KM O&M Procedure 2633 – Annulus Monitoring, Effective March 1, 2020