

Natural Gas Pipeline Company
of America LLC

June 24, 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 1-2020-1007W – Warning Letter to Natural Gas Pipeline Company of America LLC

Dear Mr. Burrough:

Natural Gas Pipeline Company of America LLC (NGPL) submits this Response to the Warning Letter referenced above.

From August 6 – 8, 2019, and September 10 – 12, 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 (3) and Columbus City Storage Fields (3) in Columbus City, IA. On the basis of the inspection, PHMSA issued a warning letter alleging a possible violation of the Pipeline Safety Regulation, Title 49, Code of Federal Regulations.

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

§ 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 failed to follow its written procedures for implementing the requirements of API RP 1171. Specifically, NGPL failed to follow its written procedure O&M 1900, developed to comply with API RP 1171, Section 11.4.2, Plan Effectiveness (Section 11.4.2).

Section 11.4.2 requires that operators test their emergency response plans for effectiveness. It states:

The operator shall establish a program to determine operator familiarity with emergency plans and procedures and periodic testing of the effectiveness of the plan in accordance with 10.6.

NGPL's O&M 1900 included procedures pursuant to this requirement. The procedure stated that:

1001 Louisiana Street • Suite 1000 • Houston, TX 77002 • (713) 420-2600

“Area/Facility Managers will schedule annual area/facility training reviews and/or drills to determine effectiveness of the site-specific ERP.”

However, at the time of the inspection, NGPL stated that they had created a form for the effectiveness review, but had no documentation for the 2018 review. Therefore, NGPL failed to follow its written procedures that were developed to comply with API RP 1171, Section 11.4.2.

NGPL Response:

NGPL conducts annual emergency drills to determine effectiveness of the site-specific Emergency Response Plan (ERP). The elements of the drill consist of: 1.) Implementing a mock emergency scenario; 2.) Completing a mock emergency response following our ERP which includes the Storage Well Crisis Response Plan; 3.) Conducting discussions with employees regarding the emergency response scenario and the effectiveness of the response; 4.) Considering whether modifications to procedures should be made.

Based on the comprehensive nature of the drill and the steps described above, NGPL believes it met the intent of the referenced regulatory requirements.

Prior to the August 2019 PHMSA inspection, the form utilized by NGPL for documentation of emergency drills was updated to address recommendations made in previous independent PHMSA inspections. The updated version of the form requires specific information regarding the effectiveness of the ERP and Storage Well Crisis Response Plan. The updated form was used by NGPL in its 2020 annual emergency drill and will be used going forward.

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, Codes and Compliance
Eric Gentles, Manager Engineering