

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 27, 2017

Mr. Kenneth Grubb
Chief Operating Officer
Kinder Morgan Natural Gas Pipelines
Southern Natural Gas Company
1001 Louisiana Street
Houston, TX 77002

CPF 2-2017-1003W

Dear Mr. Grubb:

From February 13 to February 17 and from February 27 to March 2, 2017, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety, inspected Southern Natural Gas Company (SNG) facilities in Louisiana, pursuant to Chapter 601 of 49 United States Code.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is:

- 1. §192.161 Support and anchors.**
...(c) Each support or anchor on an exposed pipeline must be made of durable, noncombustible material and must be designed and installed as follows:

SNG failed to meet the regulation because it did not ensure that each support of an exposed pipeline was made of noncombustible material.

During an on-site inspection of SNG's facility at Air Products Tap (M.P 68.202 on the 20-inch Main Pass-Franklinton), PHMSA inspectors observed supports of the exposed pipeline made, in part, of wood. Please note that, absent a definition in §192.3 of the Code of Federal Regulations or other incorporated references, Webster's defines "support" as "something that serves as a foundation, prop, brace, or stay." While the support components in immediate contact with the exposed pipe is made of steel, the entire load-bearing platform conveying the load to a solid foundation is wood, a combustible material.

As of April 27, 2017, under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists up to a maximum of \$2,090,022 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in SNG being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 2-2017-1003W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

James A. Urisko
Director, Office of Pipeline Safety
PHMSA Southern Region