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FILE NO: 72841.000002

April 7, 2008

By E-Mail & Express U.S. Mail

Mr. Jeffrey D. Wiese
Associate Administrator
Department of Transportation
Pipeline and Hazardous Materials
Safety Administration
1200 New Jersey Avenue, S.E.
East Building, 2nd Floor (PH)
Washington, D.C. 20590

Re: Petition for Reconsideration
In the Matter of Terasen Pipelines (USA), Inc.
CPF No. 3-2007-5027H

Dear Mr. Wiese:

On behalf of Kinder Morgan Pipelines (USA), Inc., formerly known as Terasen Pipelines (USA), Inc., as operator of Platte Pipeline Company (hereinafter referred to as Platte or the Company), we respectfully submit a Petition for Reconsideration on the Post-Hearing Decision Continuing Corrective Action Order (Final Order). The Final Order was issued by the Pipeline and Hazardous Material Administration (PHMSA) to, and received by, Platte on March 17, 2008. This Petition is filed within 20 days of that date, and therefore is timely.

When the Bellflower incident occurred on September 6, 2007, Platte responded immediately by shutting the line down and conferring with the Agency on the appropriate pressure restrictions and subsequent restart plans. Platte was surprised by the issuance of the Corrective Action Order (CAO) without prior notice or opportunity for discussion, given the Company's prompt and effective response and coordination with PHMSA. Nonetheless, Platte has worked cooperatively with the Agency in responding to the CAO and preparing the Return to Service Plan (RSP) required by the terms of the CAO.

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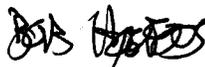
Mr. Jeffrey D. Wiese
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As reflected in the Request for Hearing, the relief that Platte requested from the outset of this matter was for the Agency to withdraw the hazardous facility finding or convert the CAO to a Consent Order upon approval of the RSP. While Platte is disappointed by the Final Order, Platte remains optimistic that PHMSA will approve the RSP. For that reason, this Petition is being filed solely to preserve Respondent's rights in the event that the parties do not ultimately reach a satisfactory resolution.

Platte shares PHMSA's desire to ensure public safety and enhance pipeline system integrity. The Company was therefore pleased to see the interim final rule that was issued by the Agency last week to establish new procedures for issuing safety orders, among other things. *73 Fed. Reg. 16,562 (March 28, 2008) ("Pipeline Safety: Administrative Procedures, Address Updates, and Technical Amendments")*. Had the rule been in place last year, we believe that PHMSA would have had additional tools at its disposal that may have been more appropriate for this matter.

Thank you for your consideration. If you have any questions about this Petition for Reconsideration, or about this matter generally, please do not hesitate to contact either me (at 404.888.4042) or Catherine Little (at 404.888.4047).

Sincerely,



Robert E. Hogfoss

Enclosure

cc: Ivan Huntoon (PHMSA)
David DeVeau, Esq. (Kinder Morgan)
Jessica Toll, Esq. (Kinder Morgan)
Catherine Little, Esq. (Hunton & Williams)

**Before the
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
Washington D.C.**

_____)
In the Matter of)
)
Kinder Morgan Pipelines (USA), Inc.)
f/k/a Terasen Pipelines (USA), Inc.,)
)
Respondent)
_____)

CPF No. 3-2007-5027H

PETITION FOR RECONSIDERATION

In its Post-Hearing Decision Continuing Corrective Action Order (Final Order) dated March 17, 2008, the Pipeline & Hazardous Materials Safety Administration (PHMSA), denied the request for relief by Kinder Morgan Pipelines (USA), Inc., formerly known as Terasen Pipelines (USA), Inc., as operator of the Platte Pipeline system (hereinafter referred to as Platte or the Company) in the above referenced matter. Pursuant to 49 C.F.R. § 190.215(a), Platte is submitting this Petition for Reconsideration of the Final Order in order to preserve its rights.

From the outset of this matter, Platte worked cooperatively with PHMSA in addressing safety and integrity issues relating to the September 6, 2007, failure near Bellflower, Missouri giving rise to the Corrective Action Order (CAO) that is the basis for this action. As detailed in the Request for Hearing submission and in Platte's Post-Hearing Submittal, it was and remains Platte's position that a hazardous condition did not exist at the time of issuance of the CAO because of the prompt actions taken by

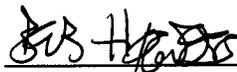
Platte in coordination with PHMSA and with PHMSA approval (e.g., pressure restrictions, agreement to conduct further investigations and analytical work, etc.).

Platte therefore requested that PHMSA rescind the "hazardous" finding contained in the CAO, either by withdrawing the CAO itself, or converting the CAO to a Consent Order.

By the date of the Hearing, Platte had fully complied with the vast majority of the requirements called for in the CAO. In particular, Platte had prepared and submitted a Return to Service (RSP) plan, that addressed in detail the investigative, analytic and operational actions that Platte had already undertaken, or had planned, to prevent recurrence of this type of incident. Platte continues to comply with the terms of the CAO and to work with PHMSA to obtain approval of its RSP. In order to preserve its rights, however, Platte respectfully requests that PHMSA reconsider the Final Order.¹

Platte continues to work with PHMSA to reach final approval of the RSP and resolve this proceeding, and the Company is simply filing this Petition to preserve its rights.

Respectfully submitted,



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¹ For the record, there are two minor factual inaccuracies contained in the Final Order: (1) no homes were evacuated, not three (see p. 1, second paragraph); and (2) a release of 15 barrels occurred downstream from Casper Station on February 1, 2006, not fifty (see p. 3, last bullet).

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