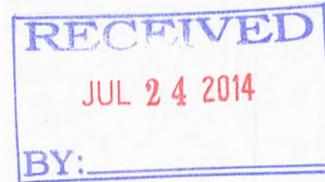




El Paso Natural Gas
Company, L.L.C.
a Kinder Morgan company

July 17, 2014

Mr. R. M. Seeley, Director
Southwest Region Office
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
8701 South Gessner, Suite 1110
Houston, TX 77074



**Re: CPF 4-2014-1006W
Warning Letter**

Dear Mr. Seeley,

El Paso Natural Gas Company, L.L.C., (EPNG) is in receipt of the above referenced Warning Letter, dated May 13, 2014, identified as CPF 4-2014-1006W. As noted in the Warning Letter, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), reviewed the MAOP Exceedance Report, noted in the Warning Letter as Safety Related Condition Report 2012-0088 as submitted by EPNG on October 12, 2012, and found EPNG in apparent violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The probable violation noted was in reference to 49 CFR § 192.619 **Maximum allowable operating pressure: Steel or plastic pipelines...(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum operating pressure determined under paragraph (c) of (d) of this section....**

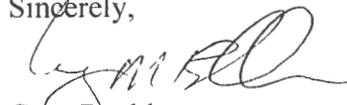
As noted in the Warning Letter, EPNG reported that on four (4) occasions in 2012 the La Tuna Lateral experienced an overpressure condition that met the reporting criteria for a safety related condition as described in Advisory Bulletin (ADB-2012-11) where a portion of the lateral was operated at a pressure that exceeded the maximum allowable operating pressure (MAOP) plus allowable buildup. The established MAOP for the line, at the time of the reported event was 700 psig. The maximum pressures reported were 787 psig on April 25, 771 psig on August 11, 779 psig on October 6 and 793 psig on October 7. Documentation of the time period for each event along with a daily record indicating exceedance of the 700 psig MAOP was provided via SCADA documentation at PHMSA's request following the initial EPNG report.

EPNG Response:

As was noted in the MAOP Exceedance Report submitted by EPNG, replacement pressure regulation and overpressure protection was installed on October 9, 2012, to resolve the repeated MAOP issue. Following that corrective action, all of the pipeline components which had been exposed to operating pressures that exceeded their design pressure limits were replaced.

If you should have any questions related to this response, please feel free to contact Reji George at 713-420-5433.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gary Buchler', written over a faint, illegible typed name.

Gary Buchler,
Vice President, Engineering/Operations