

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 13, 2014

Mr. Gary Buchler  
Vice President Engineering/Operations  
KMI Pipeline  
1001 Louisiana Street  
Houston, Texas 77002-5089

**CPF 4-2014-1006W**

Dear Mr. Buchler:

Between October 16, 2012 and March 31, 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, reviewed Safety Related Condition Report 2012-0088 submitted on October 12, 2012, by El Paso Natural Gas Company for a safety related incident that occurred in El Paso County, Texas.

As a result of the review, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

1. **§ 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 allowable operating pressure determined under paragraph (c) or (d) of this section...**

As indicated in your Safety Related Condition Report, El Paso Natural Gas Company experienced an overpressure condition that met the reporting criteria for a safety related condition as described in Advisory Bulletin (ADB-2012-11). On four (4) occasions in 2012, the La Tuna Prison lateral, a portion of your El Paso-Pecos River Unit, was operated at a pressure that exceeded the maximum allowable operating pressure plus allowable buildup. The established MAOP for the line, at the time of the event and report was 700 PSIG. The maximum pressures exceeded 110% of the MAOP of the line on:

- April 25, 2012            787 psig max.            6+ hrs.
- August 11, 2012        771 psig max            5+ hrs.
- October 6, 2012        779 psig max            10+ hrs.
- October 7, 2012        793 psig max            12+ hrs.

The pipeline continued to exceed the MAOP of 700 psig for the complete 24 hour daily record as furnished to the investigator.

This event is reflected in the Safety Related Condition Report you filed with PHMSA, as well as provided SCADA documentation related to the event.

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.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2014-1006W**. 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,

R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration