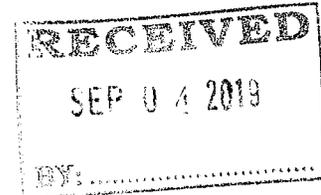




September 3, 2019

Mary L. McDaniel, P.E.  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 S. Gessner Road, Suite 630  
Houston, TX 77074



Re: CPF 4-2019-1009

Dear Ms. McDaniel:

Kinder Morgan Louisiana Pipeline LLC (KM) is in receipt of the NOPV issued July 22, 2019 and received on August 5, 2019. The NOPV alleges that:

KM failed to construct the Acadia, Louisiana Compressor Station and pipeline facility in accordance with its written Engineering Design Manual ... with fusion bond epoxy (FBE) on multiple instances. While reviewing records associated with the plant applied FBE dry film thickness coating of the 42-inch pipe, PHMSA discovered 16 out of 17 instances where the records indicated the FBE coating thickness was thicker than the 25 mils maximum in KM's written specification. In addition, PHMSA reviewed the field applied girth weld coating inspection records and discovered multiple instances of dry film thickness measurements that were either under 14 mils or above 25 mils. PHMSA noted that in the locations where the dry film thickness was above 25 mils, KM did not increase its holiday detection voltage commensurate with the higher thickness. As a result, KM may have failed to properly identify the location of holidays (coating defects).

The NOPV included a proposed compliance order. KM has concluded that it will not seek appeal of the NOPV and will comply with the proposed compliance order upon receipt of the final order. However, KM wishes to clarify that there is no safety issue associated with the coating thickness. The coating in question meets the manufacturer's specifications. KM's coating specifications have a more conservative maximum criterion than the manufacturer's specifications to ensure

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that the coating is flexible in the event that it is field-bent before installation. However, in this instance none of the coating was subject to field-bending. Therefore the thicker coating above 25 mils is not a concern and actually provides an increased level of protection. All coating on the project that was less than 14 mils was on above ground piping, some of which only had primer, that was later painted. KM has reviewed all field applied girth weld coating inspection records on the referenced project and all records met KM's specifications minimum and maximum thickness for field-applied coatings (C1080 Below-Grade or Submerged Pipe Coatings or C1230 Atmospheric Coatings for below-grade and atmospheric coatings, respectively). Furthermore, the coating holiday detection voltage met the KM specifications and those of the industry standards. Last, and perhaps most importantly, KM is following its procedures to assure that the line has adequate cathodic protection (CP) which is the most important factor in preventing external corrosion.

While there is no risk to the pipeline because of the coating application, KM acknowledges that our procedure was not as clear as it could have been on when the maximum thickness restriction should apply and so we are willing to accept the proposed compliance order to demonstrate to PHMSA that the FBE is adequate and effective.

If you need further information, please feel free to contact me at ron\_bessette@kindermorgan.com, 713-420-6012 or you can contact Jaime Hernandez at jaime\_hernandez@kindermorgan.com, 713-369-9443.

Sincerely,



Ronald S. Bessette  
Vice President of Operations