

**Natural Gas Pipeline Company  
of America LLC**

October 29, 2020

Ms. Mary McDaniel  
Director, Southwest Region  
Office of Pipeline Safety  
Pipeline and Hazardous Materials Safety Administration  
8701 S. Gessner, Suite 630  
Houston, Texas 77074

RE: Natural Gas Pipeline Company of America LLC  
CPF No. 4-2020-1009  
Written Response

Dear Director McDaniel:

Pursuant to 49 C.F.R. Part 190.208(a)(3), Natural Gas Pipeline Company of America LLC (NGPL or the Company) submits this written response to the above referenced Notice of Probable Violation (NOPV) and Proposed Civil Penalty issued by the Pipeline and Hazardous Materials Safety Administration (PHMSA) dated September 30, 2020.

**NGPL Response to Alleged NOPV Violation**

**PHMSA NOPV Item 1:**

**§192.805 Qualification Program**

**(b) Ensure through evaluation that individuals performing covered tasks are qualified**

Natural Gas Pipeline Company of America (NGPL) failed to ensure that personnel used to carry out the welding inspection task, CT 24.02.01, were qualified to perform the task. CT 24.02.01 is a covered task under NGPL's Operator Qualification Program. Daily welding records reviewed show that two different welding inspectors were not qualified to perform the task. First, the welding inspections completed on June 2, 2017, and on June 7, 2017, were performed by an individual not qualified to do the welding inspection task, CT 24.02.01. Second, the welding inspections completed on January 9, 2019, also indicated that welding inspections were performed by an individual not qualified to do covered task, CT 24.02.01.

**NGPL Response to NOPV Item 1:** Each of the three welds conducted on those two days underwent non-destructive examination (NDE) using either an x-ray or a magnetic particle test pursuant to API 1104 by someone with the proper Operator Qualification (OQ). The documentation is clear that, in each instance, the weld passed the NDE inspection and so the sufficiency and integrity of the welds are not an issue. NGPL understands PHMSA's point that

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the paperwork regarding whether an additional, visual inspection was also performed by an OQ qualified person is not as clear as it could be. For that reason, NGPL will modify its procedures to ensure that the documentation clearly demonstrates that visual inspection of the welds was performed by a person qualified under OQ Covered Task 24.02.01.

NGPL shares PHMSA's commitment to pipeline safety and appreciates you bringing the issue to our attention. If you have further questions, please feel free to contact me at 713-369-8763 or [Kenneth\\_grubb@kindermorgan.com](mailto:Kenneth_grubb@kindermorgan.com) or Jaime Hernandez, Director of Engineering at 713-369-9443 or [Jaime\\_hernandez@kindermorgan.com](mailto:Jaime_hernandez@kindermorgan.com).

Sincerely,



Kenneth W. Grubb  
Chief Operating Officer, Kinder Morgan, Inc.  
Natural Gas Pipelines, as Operator of NGPL

cc:

Jaime Hernandez, Director, Engineering  
Jessica Toll, Assistant General Counsel