



March 13, 2012

Chris Hoidal  
Director  
Office of Pipeline Safety  
12300 W. Dakota Avenue, Suite 110  
Lakewood, CO 80228

Re: CPF 5-2012-1002W

Dear Mr. Hoidal:

On February 21, 2012 Kinder Morgan (KM) received correspondence from the Pipeline and Hazardous Materials Safety Administration (PHMSA) indicating that during an inspection from October 24 – 27, 2011 on our Transcolorado gas transmission companies North Unit assets located in connection with KM's Grand Junction, Colorado offices a finding of non-compliance was noted. As the result of the finding of non-compliance a Warning Letter was issued by PHMSA to which KM wishes to respond. For the purposes of clarity KM will repeat the violation and then in bold text provide KM's response.

§192.731 Compressor stations: Inspection and testing of relief devices.

(a) Except for rupture discs, each pressure relieving device in a compressor station must be inspected and tested in accordance with §§192.739 and 192.743, and must be operated periodically to determine that it opens at the correct set pressure.

At the time of the inspection, records required by §192.731(a) indicated that the annual inspection and testing was not performed within the required time interval referenced in §192.739(a). The Whitewater Compressor Station, OPP Relief Valve Summary Reports for 2008 and 2009 show that the valves were inspected and tested on February 6, 2008 and May 14, 2009. The fifteen month maximum time interval between test dates was exceeded by eight (8) days when inspected and tested in 2009.

**Kinder Morgan's Response:**

**KM accepts our responsibilities as a prudent operator to conduct all required inspections within the time frame allotted within the regulations. KM has taken the appropriate actions with local operating personnel to ensure that they are aware of KM's commitment to regulatory compliance in our operations and the need to perform all inspections in a timely fashion.**

If PHMSA has any further questions with regard to this matter please don't hesitate to contact me.

Sincerely,

Bruce Hancock  
Director, Compliance / Codes and Standards  
Gas Division  
Kinder Morgan Inc.  
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