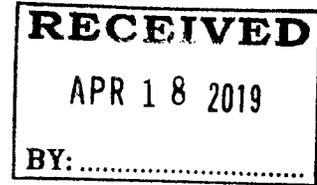




**El Paso Natural Gas  
Company, L.L.C.**  
a Kinder Morgan company



April 17, 2019

**Via E-Mail and FedEx**

Chris Hoidal  
Acting Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
1200 W. Dakota Avenue, Suite 110  
Lakewood, CO 80228

**Re: El Paso Natural Gas Company, L.L.C. – Deming East Complex Facilities - New Mexico and Texas / CPF 5-2019-1002W**  
Inspection Dates: April 17 - 24, April 24 - 28, June 5 - 9, and June 12 - 16, 2017

Dear Mr. Hoidal:

El Paso Natural Gas Company, L.L.C. (“EPNG”) responds herein to the Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) Warning Letter (“Letter”), dated January 17, 2019, in the above-referenced matter.

**INSPECTION FINDINGS:**

1. **§192.605 Procedural manual for operations, maintenance, and emergencies.**  
**(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures and conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.**

Kinder Morgan was unable to provide documentation that a review or update of the emergency manual occurred in calendar years 2014 and 2015, for the Deming East Complex.

Response: During the audit, EPNG produced Maximo work tickets for the annual Emergency Response Plan (ERP) review. It also retained the signed cover sheet documenting who had participated in the 2016 annual review, but had previously discarded the cover sheets for the 2014 and 2015 annual reviews. While EPNG believes the electronic record in Maximo is sufficient to demonstrate the annual ERP review pursuant to 49 CFR §192.605 (a), going forward the signed cover sheets will be scanned and attached to the Maximo work ticket.

EPNG refers to the 2014 work order 14-1234901 and 2015 work order 15-607903 (EPNG-0000001 – EPNG-0000006).

2. **§192.615 Emergency Plans.**

**(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:**

**(1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;**

While reviewing records for calendar years 2014 through 2016 for the City of Deming and Luna County, it was determined that the operator failed to establish and maintain liaisons with public officials. Only records demonstrating liaison with emergency responders were provided during the inspection.

Response: EPNG interfaced with numerous public officials (“PO”) and emergency responders (“ER”) throughout the City of Deming and Luna County from 2014 through 2016, via events, face-to-face, e-mail, and mass mailing of public awareness materials (EPNG-0000007 – EPNG-0000014). Please note that EPNG’s procedures require PO mailings every three years.

3. **§192.736 Compressor stations: Gas detection.**

**(c) Each gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests.**

Kinder Morgan (KM) personnel did not adequately inspect their gas detection and alarm system at one of their compressor stations to ensure that they are being maintained to function properly. Kinder Morgan specified an inspecting and testing interval for these systems in their Operations and Maintenance (O&M) manual as required by 192.605(a). KM maintenance records indicate that they have not followed their procedure in accordance with their O&M Manual, specifically the mandated testing activities for their gas detection system.

Kinder Morgan's Procedure 550, *Testing of Gas and Fire Detection Systems*, requires that interval testing of the gas detection system be conducted at least four (4) times each calendar year, not to exceed 4.5 months. Prior to 2014, the gas detection frequency was established to be conducted annually.

A review of the gas detection testing records indicated that Kinder Morgan personnel did not conduct the performance tests at the revised frequency, as established by Procedure 550. Examples of non-compliance were found at the following locations:

- Lordsburg Compressor Station: Plant A - 6 gas detectors, Plant B - 3 gas detectors, Plant C - 3 gas detectors.

Calendar Year 2014: Only one inspection occurred during this year, on 7/17/2014.

Calendar Year 2015: Plant C - Records failed to demonstrate that all three gas detectors were inspected during each quarter (March/June/September/December).

Calendar Year 2016: Plant C - Records failed to demonstrate that all three gas detectors were inspected during each quarter (April/July/September/December).

Response: EPNG has updated its work management system to create work orders for gas detection and alarm system inspection four times each calendar year not to exceed 4.5 months, and re-set the high level alarms in accordance with the O&M manual.

4. **§192.709 Transmission lines: Record keeping.**

**Each operator shall maintain the following records for transmission lines for the periods specified:**

**(c) A record of each patrol, survey, inspection, and test required by subparts L and M of this part must be retained for at least 5 years or until the next patrol, survey, inspection, or test is completed, whichever is longer.**

Kinder Morgan was unable to provide records that demonstrated compliance for continuing surveillance in calendar year 2014, in accordance with their procedure O&M Manual, Procedure #218-Continuing Surveillance, and §192.613(a).

Response: Unfortunately the O&M Section 218 – Continuing Surveillance – Operations Manager Checklist was inadvertently misfiled and so was not immediately found when the inspector asked for it. However, it was located and provided the following day, and a copy is also attached as EPNG-0000015 – EPNG-0000016. Note this is the same Checklist used for the entire operating area and therefore also applies to El Paso-Pecos River / CPF 5-2019-1004W Warning Letter, Item 5.

5. **§192.605 Procedural manual for operations, maintenance, and emergencies.**

**(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures and conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.**

Kinder Morgan's annual review and update of their procedural manual appears inadequate. The procedural manual is required by 192.605(e) to include procedures that address Continuing Surveillance, as prescribed in 192.613(a). Kinder Morgan records provided

during the inspection could not substantiate that all activities in Procedure #218 for Continuing Surveillance were included in the annual review for calendar years 2015 and 2016.

Response: See response to Item 4 above. Regulation 49 CFR § 192.605 does not specify a type of documentation that is necessary and EPNG respectfully asserts that O&M Section 218 – Continuing Surveillance – Operations Manager Checklist is adequate to document compliance with the regulation. For purposes of future compliance, EPNG will be creating a form to document that all activities in O&M Procedure 218 for continuous surveillance were included in the annual review. EPNG has also created a Maximo work ticket for this annual review and update. Upon completion, the form will be uploaded into Maximo when the work ticket is closed.

6. **§192.705 Transmission lines: Patrolling.**

**(b) The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in the following table:**

	Maximum interval between patrols	
Class location of line	At highway and railroad crossings	At all other places
1, 2	7 1/2 months; but at least twice each calendar year	15 months; but at least once each calendar year.
3	4 1/2 months; but at least four times each calendar year	7 1/2 months; but at least twice each calendar year.
4	4 1/2 months; but at least four times each calendar year	4 1/2 months; but at least four times each calendar year.

Patrolling records for 2013 did not demonstrate that Kinder Morgan patrolled Line 1005 (East Zone District Division Line Florida Station to Gage Station) twice in the calendar year. Only one patrol occurred on July 22, 2013.

Response: The work management system has been updated to produce work tickets on the frequency required by the regulation.

7. **§192.479 Atmospheric corrosion control: General**

**(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.**

Kinder Morgan did not clean and coat pipelines or portions of pipelines that were exposed to the atmosphere at the following location:

- Line 1005 (Old Station #4) had no coating on aboveground piping.

Response: This pipe was inspected by an OQ-qualified person and found to be in good condition on April 12, 2017. Therefore, the PHMSA inspection was the first time that the corrosion issue was identified. Upon discovery, EPNG took appropriate steps to recoat the pipe within the prompt remedial timeframe required by O&M 918.

EPNG's 2017 annual Atmospheric Inspection Report is attached (EPNG-0000017).

**8. §192.481 Atmospheric corrosion control: Monitoring**

**(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:**

If the pipeline is located:	Then the frequency of inspection is:
Onshore	At least once every 3 calendar years, but with intervals not exceeding 39 months
Offshore	At least once each calendar year, but with intervals not exceeding 15 months

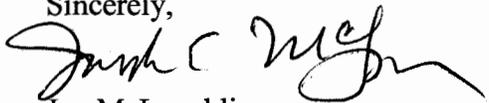
Kinder Morgan was not conducting atmospheric inspections that could adequately assess the level of atmospheric corrosion. During the field inspection of Block Valve #41 ¼ on Line 1600, the valve was observed to be housed in a below grade pit type structure. The valve was exposed to the atmosphere within the pit area. When asked about performing atmospheric corrosion inspections on the entire exposed area (360°), field staff stated they do not go into the pit to check for evidence of corrosion, they only observe from above.

Kinder Morgan was not performing adequate atmospheric corrosion inspection on each pipeline or portion of pipeline that is exposed to the atmosphere. The inspection must be conducted so any evidence of atmospheric corrosion can be evaluated.

Response: EPNG has taken steps to ensure that for future atmospheric inspections of below-grade pit type structures the inspector either: 1) enters the pit using a confined space permit to conduct a complete visual inspection; or 2) utilizes mirrors or other means (e.g. video technology) to perform a complete visual inspection of the equipment from above.

Should you have any questions or require any additional information or supporting documentation, please do not hesitate to contact me at (713) 369-9847, or contact Jaime Hernandez, Director – Engineering at (713) 369-9443.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe McLaughlin". The signature is fluid and cursive, with a large initial "J" and "M".

Joe McLaughlin  
Vice President, Operations

cc: Jaime Hernandez