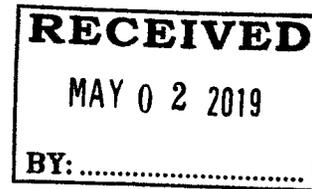




**El Paso Natural Gas  
Company, L.L.C.**  
a Kinder Morgan company



April 24, 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. – JAL North Complex - New Mexico and Texas / CPF 5-2019-1003W**  
Inspection Dates: April 17 - 21, April 24 - 28, and July 23 - 28, 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 18, 2019, in the above-referenced matter.

**INSPECTION FINDINGS:**

1. **§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 counties of Lea, New Mexico, Yoakum, Texas, and Andrews, Texas, it was determined that Kinder Morgan was unable to provide documentation which established and maintained liaisons with public officials, in accordance with 192.615(c)(1). Records provided during the inspection only demonstrated that liaisons were established and maintained with emergency responders.

Response: EPNG interfaced with numerous public officials (“PO”) and emergency responders (“ER”) throughout the counties of Lea, New Mexico, Yoakum, Texas, and Andrews, Texas from 2014 through 2016, via events, face-to-face, e-mail, and mass mailing of public

awareness materials (EPNG-0000001 – EPNG-0000031). Please note that EPNG's procedures require PO mailings every three years.

2. **§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 2014, 2015, and 2016.

Response: Regulation 49 CFR 192.605 does not specify a type of documentation that is necessary. 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.

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 location:

Plains Compressor Station –

Calendar Year 2014 - The operator failed to perform inspections at least 4 times each calendar year. Inspection dates occurred on 5/27/14, 9/15/14, and 11/7/14.

Calendar Year 2015- The operator failed to perform inspections at least 4 times each calendar year. Inspection dates occurred on 5/18/15, 9/11/15, and 12/9/15.

Additionally, KM was not properly maintaining the gas detection alarm systems at the compressor stations. Kinder Morgan's procedure requires that the high-level detectors in compressor buildings be set to alarm at a high-level set point of 30-40% of the Lower Explosive Limit (LEL).

Records for the Plains Compressor Station indicated that all of the high-level alarms were set higher than the level established by the procedure. Records reviewed indicated the high-level alarms had been set 45% of the LEL.

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. **§192.739 Pressure limiting and regulating stations: Inspection and testing.**
  - (a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating stations and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is -
  - (3) Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of 192.201(a).

Calendar year 2015 records for the over-pressure protection relief device located on Line 1115 at the Odessa Buckhorn Receipt indicated a set pressure of 780 pounds per square inch (psi), well above the allowable maximum allowable operating pressure (MAOP) of 595 psi for Line 1115. The records indicated the pressure was set to relieve above the 110% of MAOP allowable by §192.201(a)(2)(i).

Response: EPNG has re-set the relief device setting to the correct pressure.

5. **§192.705 Transmission lines: Patrolling.**
  - (a) Each operator shall have a patrol program to observe surface conditions on and adjacent to the transmission right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.
  - (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:

Class location of line	Maximum interval between patrols	
	At highway and railroad crossings	At all other places
1, 2	7½ months; but at least twice each calendar year	15 months; but at least once each calendar year.
3	4½ months; but at least four times each calendar year	7½ months; but at least twice each calendar year.
4	4½ months; but at least four times each calendar year	4½ months; but at least four times each calendar year.

While confirming highway and railroad crossings through Kinder Morgan's GeoMap program, all crossings in Class Locations 1 and 2 were not identified, therefore, not patrolled twice per calendar year, not to exceed (NTE) 7.5 months and/or locations exceeded the intervals at the following locations:

- Line 1103- 9/1/2015 PM 585403 WO 15-527173, patrolling survey failed to include road crossings at Frying Pan Rd (Hwy 3) and Cheyenne Draw Rd (CR 103).
- Line 1103-2/23/2016 PM 585403 WO 15-904548, patrolling survey failed to include road crossings at Frying Pan Rd (Hwy 3) and Cheyenne Draw Rd (CR 103)
- Line 1103- 1/12/2017 PM 585403 WO 16-883593, patrolling survey failed to included road crossings at Cheyenne Draw Rd (CR 103) and Dinwiddie Lane.
- Line 1115 - 2014 highway and railroad crossing identify four (4) crossings that don't appear on the 2015 through July 2017 records. CR 540 does not appear on any patrolling records but was confirmed through Kinder Morgan's Geo Map as a road crossing at Mile Post (MP) 27. Therefore, these road crossings were not being patrolled in 2015 through July2017.
- Line 1115 - MP 33 to MP 55: 2014 through 2017 records do not identify road crossings at MP 38-39 (NW 9500 Rd) or MP 42 (CR 328), therefore, indicating they were not patrolled.

- Line 1100 - Highway and railroad crossing were only patrolled once in calendar year 2015 (W0#15-527210 on July 14, 2015).
- Line 1115- Highway and railroad crossings patrolling survey exceeded the 7.5 month intervals from 8/18/2014 to 6/17/2015, 11/20/2015 to 7/20/2016, and 11/29/2016 to 7/17/2017.
- Line 3075- PM 646772 WO 17-547001 exceeded the 7.5-month interval from 3/8/16 to 10/24/16.
- Line 1102 (168 + 2852 to 202 + 3967) - PM 646765 WO 17-547015 exceeded the 7.5- month interval from 5/23/16 to 3/6/17.
- Line 1119 - PM 646770 WO 17-546996 exceeded the 7.5-month interval from 5/23/16 to 3/6/17.

Response:

Each location in question was patrolled multiple times (up to 10 times) each year by aerial patrol. Below and attached is documentation demonstrating that the patrols happened at least twice per calendar year, not to exceed 7.5 months. In addition, all of these crossing locations have been added to GeoMap.

PHMSA Bullet #1:

- Line 1103- 9/1/2015 PM 585403 WO 15-527173, patrolling survey failed to include road crossings at Frying Pan Rd (Hwy 3) and Cheyenne Draw Rd (CR 103).

EPNG Response to Bullet #1:

Line 1103 was patrolled twice in 2015, twice in 2016, and twice in 2017 by an aerial patrol. Evidence of the patrols occurring on February 10, 2015 and September 3, 2015, February 16, 2016 and July 29, 2016, and February 22, 2017 and September 20, 2017 are attached (EPNG-0000032 – EPNG-0000133).

PHMSA Bullet #2:

- Line 1103-2/23/2016 PM 585403 WO 15-904548, patrolling survey failed to include road crossings at Frying Pan Rd (Hwy 3) and Cheyenne Draw Rd (CR 103)

EPNG Response to Bullet #2:

See EPNG's response to Bullet #1.

PHMSA Bullet #3:

- Line 1103- 1/12/2017 PM 585403 WO 16-883593, patrolling survey failed to include road crossings at Cheyenne Draw Rd (CR 103) and Dinwiddie Lane.

EPNG Response to Bullet #3:

See EPNG's response to Bullet #1.

PHMSA Bullet #4:

- Line 1115 - 2014 highway and railroad crossing identify four (4) crossings that don't appear on the 2015 through July 2017 records. CR 540 does not appear on any patrolling records but was confirmed through Kinder Morgan's Geo Map as a road crossing at Mile Post (MP) 27. Therefore, these road crossings were not being patrolled in 2015 through July 2017.

EPNG Response to Bullet #4:

All of Line 1115 including all road crossings was patrolled twice in 2014, twice in 2015, twice in 2016, and twice in 2017 by an aerial patrol. Evidence of the patrols occurring on February 12, 2014, September 9, 2014, January 26, 2015, November 19, 2015, April 26, 2016, October 20, 2016, and April 25, 2017 and November 15, 2017 are attached (EPNG-0000134 – EPNG-0000276).

PHMSA Bullet #5:

- Line 1115 - MP 33 to MP 55: 2014 through 2017 records do not identify road crossings at MP 38-39 (NW 9500 Rd) or MP 42 (CR 328), therefore, indicating they were not patrolled.

EPNG Response to Bullet #5:

See EPNG's response to Bullet #4.

PHMSA Bullet #6:

- Line 1100 - Highway and railroad crossing were only patrolled once in calendar year 2015 (W0#15-527210 on July 14, 2015).

EPNG Response to Bullet #6:

In addition to the July 14, 2015 patrol mentioned in PHMSA's 6<sup>th</sup> bullet, Line 1100 was also patrolled in 2015 by an aerial patrol. Evidence of the patrol occurring on January 26, 2015 is attached (EPNG-0000277 – EPNG-0000309).

PHMSA Bullet #7:

- Line 1115- Highway and railroad crossings patrolling survey exceeded the 7.5 month intervals from 8/18/2014 to 6/17/2015, 11/20/2015 to 7/20/2016, and 11/29/2016 to 7/17/2017.

EPNG Response to Bullet #7:

See EPNG's response to Bullet #4.

PHMSA Bullet #8:

- Line 3075- PM 646772 WO 17-547001 exceeded the 7.5-month interval from 3/8/16 to 10/24/16.

EPNG Response to Bullet #8:

In addition to the March 8, 2016 and October 24, 2016 patrols mentioned in PHMSA's eighth bullet, Line 3075 was patrolled by an aerial patrol on September 21, 2016. Evidence of the patrol occurring on September 21, 2016 is attached (EPNG-0000310 - EPNG-0000320).

PHMSA Bullet #9:

- Line 1102 (168 + 2852 to 202 + 3967) - PM 646765 WO 17-547015 exceeded the 7.5- month interval from 5/23/16 to 3/6/17.

EPNG's Response to Bullet #9:

In addition to the May 23, 2016 and March 6, 2017 patrols mentioned in PHMSA's 9<sup>th</sup> bullet, Line 1102 was patrolled by an aerial patrol on November 20, 2016. Evidence of the patrol occurring on November 20, 2016 is attached (EPNG-0000321 - EPNG-0000335).

PHMSA Bullet #10:

- Line 1119 - PM 646770 WO 17-546996 exceeded the 7.5-month interval from 5/23/16 to 3/6/17.

EPNG's Response to Bullet #10:

In addition to the May 23, 2016 and March 6, 2017 patrols mentioned in PHMSA's 10<sup>th</sup> bullet, Line 1119 was patrolled by an aerial patrol on November 20, 2016. Evidence of the patrol occurring on November 20, 2016 is attached (EPNG-0000321 - EPNG-0000335).

6. **§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 did not identify and inspect multiple areas of aboveground pipe exposed to the atmosphere, for evidence of atmospheric corrosion, including:

Eunice Compressor Station:

Aboveground pipe was observed to be housed in a below grade pit type structure. The pipe was exposed to the atmosphere within the pit area, located just outside of the Eunice Station. Field staff stated they only perform a visual inspection from above, failing to inspect the bottom half of the pipe that is exposed to the atmosphere.

Kinder Morgan was not performing adequate atmospheric corrosion inspection on each pipeline or portion of pipeline that is exposed to the atmosphere.

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.

7. **§192.459 External corrosion control: Examination of buried pipeline when exposed. Whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated. If external corrosion requiring remedial action under 192.483 through 192.489 is found, the operator shall investigate circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial actions exists in the vicinity of the exposed portion.**

While reviewing patrolling records, records indicated exposed buried pipe was identified during the patrolling. However, the exposed pipe was not inspected to determine if the coating was deteriorating, and no exposed piping report was completed at the following areas:

- Line 1115 - During the April 12, 2016 (5/3/2016 Completion Date) patrolling of this line (WO# 16-117903, PM3060), a section of exposed pipe was identified at coordinates (N32.491031, W -102.913403).

- Line 1100 - During the July 14, 2015 patrolling of this line (WO# 15-412239, PM2313), seven (7) sections of buried pipe were identified as exposed.

Response: In 2017 the exposed pipe was inspected to determine if coating was deteriorated and a pipeline examination report was completed for the areas listed in the Warning Letter (EPNG-0000336 – EPNG-0000341). In the future EPNG will perform similar inspections for any exposed pipe that is discovered in accordance with its O&M procedures.

September 2017 Pipeline Inspection Reports (eight in total) for Line 1100 are attached at EPNG-0000336 through EPNG-0000383.

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,



Joe McLaughlin  
Vice President, Operations

cc: Jaime Hernandez