



July 22, 2025

Robert Burrough  
Director, Eastern Region, OPS  
Pipeline and Hazardous Materials Safety Administration  
840 Bear Tavern Rd., Suite. 300  
West Trenton, NJ 08628

VIA EMAIL: [Robert.Burrough@dot.gov](mailto:Robert.Burrough@dot.gov)

Re: CPF 1-2025-031 Kinder Morgan Liquid Terminals, LLC - Notice of Amendment

Dear Director Burrough:

Kinder Morgan Liquid Terminals, LLC (KMLT) submits this response to the Notice of Amendment (CPF 1-2025-031-NOA) dated July 1, 2025, regarding the inspection conducted from August 27 through October 17, 2024.

KMLT respectfully disputes the assertion that our written procedures are inadequate under 49 CFR § 195.442(b) and § 195.402(c)(3), specifically regarding participation in multiple qualified one-call systems in the state of California. KMLT does not operate any pipeline systems or facilities in the state of California. Therefore, the reference in our O&M Manual to California's one-call systems—USA North 811 and Dig Alert—was included for general awareness and completeness but does not reflect any operational presence or obligation in that state.

KMLT's *T-O&M 204, Construction Near Company Facilities* (dated 10/09/24), explicitly states that KMLT participates in qualified state/provincial one-call systems where required. Section 3.4 of the manual affirms our commitment to compliance with applicable damage prevention regulations and outlines our participation in one-call systems in all jurisdictions where KMLT operates.

This language satisfies the requirements of § 195.442(b), as it ensures that KMLT's pipeline systems are covered by a qualified one-call system in every applicable area of operation. Since KMLT does not operate in areas with overlapping one-call systems, the additional specificity requested by PHMSA is not applicable to our current operations.

Based on our provided response, we respectfully request that PHMSA withdraw the proposed amendment. KMLT remains committed to maintaining safe and compliant operations and will continue to review and enhance our procedures as necessary.



If you have any questions, please contact me at (713)420-2609 or Dominique Gaucher at (713)992-4598.

Sincerely,

Zach Ragain  
Director – Engineering, Codes and Standards  
Kinder Morgan Operations Support Group

cc: Mary Clair Lyons, Assistant General Counsel  
Dominique Gaucher, Manager – Engineering, Codes and Standards