

Natural Gas Pipeline Company of America LLC

January 11, 2024

James A. Urisko
Director, Southern Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
230 Peachtree Street N.W., Suite 2100
Atlanta, GA 30303

Re: Warning Letter CPF 2-2023-019-WL

Dear Mr. Urisko:

Natural Gas Pipeline Company of America LLC (NGPL) has received the above Warning Letter and provides its response below. For the avoidance of confusion, the allegation of the Warning Letter is restated below, with NGPL's response immediately following.

1. §192.491 Corrosion Control Records

(a) ...

(c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist. These records must be retained for at least 5 years with the following exceptions:

(1) Operators must retain records related to §§ 192.465 (a) and (e) and 192.475(b) for as long as the pipeline remains in service...

Natural Gas Pipeline Company of America, LLC (NGPL) failed to meet the regulation because it did not maintain a record for each inspection of a cathodic protection rectifier, as required by §192.465(b). Specifically, NGPL did not have records demonstrating it had not exceeded the required 2 ½ month inspection interval for 26 rectifiers. Additionally, NGPL did not maintain a record in sufficient detail to demonstrate the adequacy of corrosion control measures for 6 rectifiers in 2018.

Response:

In an on-going effort, both prior to and following the PHMSA inspection, NGPL had a program to install Remote Monitoring Units (RMUs) on all of the cathodic protection rectifiers that did not previously have RMUs in Kansas. RMUs allow continuous monitoring of CP systems from a central location and provide personnel with immediate warning of potential corrosion hazards. That work is now complete. In addition, this operating division within NGPL, known as Division 2, created a recurring task in its work management system for the Corrosion Supervisor to periodically review the corrosion technicians' data entered into its corrosion database. This process also allows for a review of the inspection intervals of the required work to ensure compliance with the regulatory deadlines.

NGPL is committed to operating in a safe and compliant manner and appreciates the opportunity to respond to this Warning Letter. Should you have any questions about this response, or need additional information, please contact me by email at

James A. Urisko
January 11, 2024
Page 2

Natural Gas Pipeline Company of America LLC

Kenneth_Grubb@kindermorgan.com or by phone at 713-369-8763 or you can contact Zach Ragain at Zach_Ragain@kindermorgan.com or by phone 832-919-0774

Sincerely,

A handwritten signature in blue ink that reads "Kenneth W. Grubb". The signature is fluid and cursive, with the first name "Kenneth" being more prominent than the last name "Grubb".

Kenneth W. Grubb
Chief Operating Officer, Gas Pipelines

Cc: Ted Meinhold
Zach Ragain