



Colorado Interstate
Gas Company, L.L.C.
a Kinder Morgan company

November 5, 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: CPF 2-2024-016-WL

Dear Mr. Urisko:

Colorado Interstate Gas Company, L.L.C. ("CIG") acknowledges receipt of the above-referenced Warning Letter. For the avoidance of confusion, each probable violation listed in the Warning Letter is restated below, with CIG's response immediately following.

1. § 192.706 Transmission lines: Leakage surveys.

Leakage surveys of a transmission line must be conducted at intervals not exceeding 15 months, but at least once each calendar year. However, in the case of a transmission line which transports gas in conformity with § 192.625 without an odor or odorant, leakage surveys using leak detector equipment must be conducted—

- (a) In Class 3 locations, at intervals not exceeding 7 1/2 months, but at least twice each calendar year; and**
- (b) In Class 4 locations, at intervals not exceeding 4 1/2 months, but at least four times each calendar year.**

CIG failed to meet 49 C.F.R. § 192.706 because it did not perform leakage surveys of a transmission line at the required intervals. During the inspection, CIG could not produce records demonstrating that leak surveys were conducted between 2019 and 2023 for the line 226 railroad crossing located at Highway 54 and 17th Avenue. Additionally, CIG personnel confirmed in a subsequent email on August 10, 2023, that "...we did not complete the Highway and Railroad Leakage Survey Class 1 and 2 on the Cheyenne Plains line 226 A from Valve 22 to the end of the line for second period in 2022."

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Response:

To ensure continuous compliance with the leakage survey regulatory requirements, recurring work orders for the 226-A line have been implemented.

CIG takes its responsibilities to operate in a safe and compliant manner very seriously and appreciates the opportunity to respond to this Warning Letter and perform corrective action(s). Should you have any questions about the information provided, please contact Zach Ragain at Zach_Ragain@kindermorgan.com; (713) 420-2609 or Claudia Pankowski at Claudia_Pankowski@kindermorgan.com (713) 420-2460. immediately.

Sincerely,

Kenneth W. Grubb
Chief Operating Officer, Gas Pipelines

cc: Ted Meinhold, Vice President of Operations
Tom Otjen, Vice President of Pipeline Integrity
Zach Ragain, Director of Engineering Codes and Standards
Claudia Pankowski, Manager of Engineering Codes and Standards