



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

8701 South Gessner, Suite 1110  
Houston, TX 77074

## NOTICE OF AMENDMENT

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 3, 2014

Mr. Michael Catt  
Natural Gas Pipeline Company of America  
1001 Louisiana Street  
Houston, TX 77002

**CPF 4-2014-1010M**

Dear Michael Catt:

On June 24-26, 2014, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected the Natural Gas Pipeline Company of America (NGPL) procedures and records for Control Room Management in Houston, TX. The inspection included visits to the primary and backup control rooms.

On the basis of the inspection, PHMSA has identified the apparent inadequacy found within NGPLs plans or procedures, as described below:

1. **§192.631 Control room management**
  - (e) **Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:**
    - (6) **Address deficiencies identified through the implementation of paragraphs (e)(1) through (e)(5) of this section.**

The Kinder Morgan Alarm Management Plan lacks processes to address, correct and document alarm deficiencies identified during audits or reviews.

PHMSA reviewed the Kinder Morgan O&M Procedure 1100 Control Room Management,

section 3.5 Alarm Management Plan; and the Alarm Management Plan for Control Room Operations. PHMSA identified deficiencies in both documents. The plan and procedures fail to list the form used to document deficiencies. There are no time-limits set for remediating alarm deficiencies. The plan and procedures lack processes for safe pipeline operations where remediation time-limits for alarm deficiencies are exceeded.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Natural Gas Pipeline Company of America maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to R. M. Seeley, Director, SW Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2014-1010M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,



R. M. Seeley  
Director, SW Region  
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*