



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

04-11-17 A09:35 RCVD

April 10, 2017

Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
12300 W. Dakota Ave, Suite 110
Lakewood, CO 80228

Re: Response to CPF 5-2017-1002W – Warning Letter

Dear Mr. Hoidal,

On March 6, 2017 El Paso Natural Gas Pipeline Company, L.L.C. (EPNG) received correspondence from the Pipeline and Hazardous Materials Safety Administration (PHMSA) alleging indicating that during the 2016 inspection of the EPNG gas transmission pipeline system located in Ehrenberg, Phoenix and surrounding areas in Arizona a finding of non-compliance was noted. As the result of the alleged finding of non-compliance a Warning Letter was issued by PHMSA to which EPNG wishes to respond. For the purposes of clarity EPNG will repeat the probable violation and then in bold text provide EPNG's response.

- Item 1: §192.739 Pressure limiting and regulating stations: Inspection and testing.
- (a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station 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 –
 - (1) In good mechanical condition;
 - (2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;
 - (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); and
 - (4) Property installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

EPNG did not conduct inspections and tests of each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment at intervals not exceeding 15 months, but at least once each calendar year.

EPNG failed to conduct an inspection and test of St. Johns Mission regulator station on main line numbered 1124 within the 15-month interval. In 2014, EPNG performed an inspection of St. Johns Mission station on 8/30/2014. Then, the following year in 2015, EPNG inspected St. Johns Mission station on 12/04/2015. This inspection exceeds the 15-month interval.

EPNG's Response 1:

EPNG has taken the appropriate actions with local operating personnel to ensure that they are aware of EPNG's regulatory compliance obligation and the need to perform all inspections in a timely fashion.

If PHMSA has any further questions with regard to this matter please don't hesitate to contact me at 713-420-5433.

Sincerely,



Reji George
Director, Compliance / Codes and Standards
Kinder Morgan Natural Gas Division

cc: Gary Buchler, Chief Operating Officer, Gas Pipelines
Ken Grubb, Vice President, Operations
Jorge Torres, Vice President, Engineering
Ron Bessette, Vice President, West Operations
Phil Baca, Operations Manager, Division 1
Dustin Hubbard, Operations Supervisor, U.S. DOT, PHMSA, Pipeline Safety
Dennis Randolph, Program Manager, Office of Pipeline Safety, Arizona Corporation
Commission