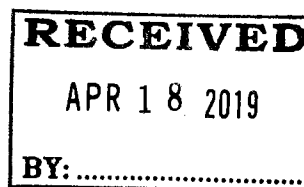




**El Paso Natural Gas
Company, L.L.C.**
a Kinder Morgan company



April 17, 2019

Via E-Mail and FedEx

Chris Hoidal
Acting Director, Western Region
Pipeline and Hazardous Materials Safety Administration
1200 W. Dakota Avenue, Suite 110
Lakewood, CO 80228

**Re: El Paso Natural Gas Company, L.L.C. – Waha Complex - New Mexico and Texas/
CPF 5-2019-1001W**
Inspection Dates: April 17 - 24, April 24 - 28, and August 14 - 18, 2017

Dear Mr. Hoidal:

El Paso Natural Gas Company, L.L.C. (“EPNG”) responds herein to the Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) Warning Letter (“Letter”), dated January 18, 2019, in the above-referenced matter.

INSPECTION FINDINGS:

1. **§192.736 Compressor stations: Gas detection.**
(c) Each gas detection and alarm system required by this section must be maintained to function properly. The maintenance must include performance tests.

Kinder Morgan (KM) personnel did not adequately inspect their gas detection and alarm system at two of their compressor stations to ensure that they are being maintained to function properly. Kinder Morgan specified an inspecting and testing interval for these systems in their Operations and Maintenance (O&M) manual as required by 192.605(a). KM maintenance records indicate that they have not followed their procedure in accordance with their O&M Manual, specifically the mandated testing activities for their gas detection system.

Kinder Morgan's Procedure 550, *Testing of Gas and Fire Detection Systems*, requires that interval testing of the gas detection system be conducted at least four (4) times each

calendar year, not to exceed 4.5 months. Prior to 2014, the gas detection frequency was established to be conducted annually.

A review of the gas detection testing records indicated that Kinder Morgan personnel did not conduct the performance tests at the revised frequency, as established by Procedure 550. Examples of non compliance were found at the following locations:

- Puckett Compressor Station- Gas detection testing records provided for calendar year 2014 documented an actual finish date of 2013. No other testing records demonstrating completion in calendar year 2014 were provided.
- Wink Compressor Station- Gas detection testing records for calendar year 2014 indicated the second and third quarterly testing occurred on the same date in August. The records provided indicate inspection and testing dates were performed on 5/1/14, 8/19/14, and 12/24/14. Therefore, personnel failed to test the hazardous gas detector at the Wink Compressor Station four times per calendar year, per the procedure.

Additionally, KM was not properly maintaining the gas detection alarm systems at the compressor stations. Kinder Morgan's procedure requires that the high-level detectors in compressor buildings be set to alarm at a high-level set point of 30-40% of the Lower Explosive Limit (LEL). Records for the Wink Compressor Station for calendar years 2015, 2016, and through May 2017 indicated that the high-level alarms were set higher than the level established by the procedure. Records reviewed indicated the high-level alarms had been set above 40% of the LEL, sometimes as high as 50% of the LEL.

Response: EPNG has updated its work management system to create work orders for gas detection and alarm system inspection four times each calendar year not to exceed 4.5 months, and re-set the high level alarms in accordance with the O&M manual.

2. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures and conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Kinder Morgan's annual review and update of their procedural manual appears inadequate. The procedural manual is required by 192.605(e) to include procedures that address Continuing Surveillance, as prescribed in 192.613(a). Kinder Morgan records provided during the inspection could not substantiate that all activities in Procedure #218 for Continuing Surveillance were included in the annual review for calendar years 2014, 2015, and 2016.

Response: Regulation 49 CFR § 192.605 does not specify a type of documentation that is necessary and EPNG respectfully asserts that the Maximo work order tickets for 2015 and 2016 (EPNG-0000001 – EPNG-0000002) are sufficient to document completion of the review and update of the procedural manual. For purposes of future compliance, EPNG will be creating a form to document that all activities in O&M Procedure 218 for continuous surveillance were included in the annual review. EPNG has also created a Maximo work ticket for this annual review and update. Upon completion, the form will be uploaded into Maximo when the work ticket is closed.

3. **§192.745 Valve maintenance: Transmission lines.**

(a) Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.

Kinder Morgan records reviewed could not demonstrate that the required valve maintenance was completed for each valve on the Waha Complex transmission pipeline facilities. A review of the records indicated the following apparent non-compliances:

- Line 3161: Valve inspection records for 2013 indicate different valve equipment descriptions as the valve inspection records for 2014, 2015, and 2016. There was no indication on any of the records that valves had been replaced or re-numbered. Additionally, the 2016 valve maintenance records did not provide the valve size, manufacturer, or description in order to cross reference to the 2013, 2014, and 2015 records.
- Line 3173: Valve inspection records provided for block valves #0 and #1 did not contain inspection dates or the names of the individuals conducting the valve inspection.

Based on the inconsistent recordkeeping, and lack of information/traceability contained within the records, compliance with 49 CFR § 192.745(a) could not be determined.

Response: EPNG has implemented improvements to its valve inspection and maintenance recordkeeping to address this issue.

4. **§192.705 Transmission lines: Patrolling.**

(b) The frequency of patrols is determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in the following table:

Class location of line	Maximum interval between patrols	
	At highway and railroad crossings	At all other places
1, 2	7½ months; but at least twice each calendar year	15 months; but at least once each calendar year.
3	4½ months; but at least four times each calendar year	7½ months; but at least twice each calendar year.
4	4½ months; but at least four times each calendar year	4½ months; but at least four times each calendar year.

Kinder Morgan did not patrol all of the line section crossings at the required patrol frequency. The records reviewed during the inspection revealed the following line section exceeded the maximum time interval between patrols:

Line 3153:

Calendar Year 2014: Kinder Morgan did not perform patrolling on their highway and railroad crossings in their Class 1 locations, twice per calendar year, not to exceed (NTE) 7.5 months. The records revealed that this line segment was only patrolled once in May 2014. No records were provided to demonstrate a second patrol occurred in 2014.

Calendar Year 2016: Kinder Morgan did not perform patrolling on all of their highway and railroad crossings in their Class 1 locations, twice per calendar year, NTE 7.5 months. The 2016 patrol records indicate this segment was only patrolled on 12/12/2016.

Response: The location in question was patrolled multiple times (up to 10 times) each year by aerial patrol. Below and attached is documentation demonstrating that the patrols happened at least twice per calendar year, not to exceed 7.5 months. In addition, all of these crossing locations have been added to GeoMap.

Line 3153 was patrolled twice in 2014 and twice in 2016 by an OQ-qualified aerial patrol. Evidence of the additional patrols occurring on November 12, 2014 and May 24, 2016 is attached (EPNG-0000003 – EPNG-0000026).

5. **§192.807 Recordkeeping.**

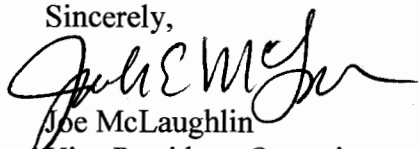
(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualifications and records of individuals no longer performing covered tasks shall be retained for a period of five years.

Kinder Morgan did not maintain records for all individuals performing covered tasks at the Wink Compressor Station. We understand that Kinder Morgan used contractor personnel to perform annual inspections on the over pressure protection relief devices, but was unable to provide records to demonstrate that the contracted individuals were qualified to perform the covered task in calendar years 2015 and 2016.

Response: EPNG understands that when it uses contractors to perform covered tasks it must be able to demonstrate that the contracted individuals are qualified to perform the covered task.

Should you have any questions or require any additional information or supporting documentation, please do not hesitate to contact me at (713) 369-9847, or contact Jaime Hernandez, Director – Engineering at (713) 369-9443.

Sincerely,



Joe McLaughlin
Vice President, Operations

cc: Jaime Hernandez