



January 16, 2015

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

Re: CPF 5-2014-1004

Dear Mr. Hoidal,

On December 18, 2014, Kinder Morgan (KM) received correspondence from your office alleging that KM committed a probable violation of the Pipeline Safety Regulations. The alleged violation was noted during an inspection from April 7-11, 2014 on the TransColorado Pipeline in Grand Junction, Colorado. As a result of the alleged violation, the correspondence included a proposed civil penalty of \$33,100.00. For the purposes of clarity, KM will repeat the violation and then in bold text provide KM's response.

§192.731 Compressor stations: Inspection and testing of relief devices.

- (a) Except for rupture discs, each pressure relieving device in a compressor station must be inspected and tested in accordance with §§192.739 and 192.743, and must be operated periodically to determine that it opens at the correct set pressure.

TransColorado failed to inspect and test relief valves in accordance with §192.739. Section §192.739(a) requires that they be inspected and tested at intervals not exceeding 15 months, but at least once per calendar year. TransColorado's records, which are required by §192.603(b), indicated that the annual inspection and testing was not performed within the required time interval referenced in §192.739(a). The Blanco Compressor Station, Relief Valve Summary Report for Relief Valves, 1029-2927-RVO, during the years 2012 and 2013 show that the valve was inspected and tested on August 15, 2012 and December 18, 2013. Furthermore, TransColorado has received Warning Letters in 2009 (CPF 5-2009-0010W) and 2012 (CPF 5-2-12-1002W) for exceeding inspection intervals of relief devices on their pipeline system. The fifteen month maximum time interval between test dates was exceeded again by one (1) month and three (3) days.

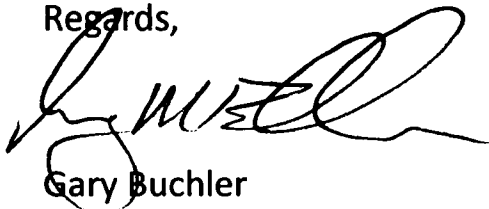
Kinder Morgan's Response:

Kinder Morgan paid the proposed civil penalty of \$33,100.00 on January 14, 2015 by wire transfer. The Fed reference number for this transaction is 0114I1B7031R026860.

Kinder Morgan accepts our responsibilities as a prudent operator to conduct all required inspections within the time frame allotted within the regulations. KM has taken appropriate actions to ensure that inspections of relief valves on the TransColorado Pipeline will not exceed the required time interval going forward. These actions include ensuring that all tracking for relief valve inspections have been transferred to our new operations management system, MAXIMO, and ensuring that local operating personnel are aware of KM's commitment to regulatory compliance and the need to perform all inspections in a timely fashion.

If you have any questions or concerns regarding this matter, please contact Reji George at 713-420-5433.

Regards,



Gary Buchler

Vice President, Operations and Engineering

KINDER MORGAN