



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

September 1, 2016

Mr. Gary Buchler  
Chief Operating Officer  
El Paso Natural Gas Company, L.L.C.  
Kinder Morgan Natural Gas Division  
1001 Louisiana Street, Suite 1000  
Houston, Texas 77002

**Docket No. PHMSA-2016-0007**

Dear Mr. Buchler:

On January 11, 2016, El Paso Natural Gas Company, L.L.C. (EPNG) wrote to the Pipeline and Hazardous Materials Safety Administration (PHMSA) requesting a special permit to waive compliance from PHMSA's pipeline safety regulation in 49 CFR §§ 192.611(a) and (d), 192.619(a), and 192.5 for pipeline segments where the class location of the segment had been changed in accordance with § 192.5(c), cluster rule. The regulation requires confirmation or revision of the maximum allowable operating pressure (MAOP) of a pipeline segment where the class location has changed.

The special permit request is for 29 segments and 6.56 miles of the EPNG natural gas transmission pipeline system located in the states of Arizona, New Mexico, and Texas. The pipeline segments are generally short in length, not continuous, and are located in multiple states and counties/parishes within those states. The regulatory relief from 49 CFR §§ 192.611, 192.619 and 192.5 through a special permit would include additional time (3-years) to either replace or pressure test the pipeline segments in the class location sliding mile and outside the cluster area, where there are over 10 dwellings for human occupancy. Pipeline segments with 10 or fewer dwellings for human occupancy outside the cluster area, but within the sliding mile, would not be replaced and EPNG would be required by the special permit conditions to implement procedures to maintain pipeline safety by identifying, assessing, and remediating integrity threats to the pipeline segments.

PHMSA is granting this special permit (enclosed), which will allow EPNG to continue to operate segments of the EPNG pipeline at their current MAOPs by implementing integrity management practices as defined in the special permit conditions until the pipe is replaced, pressure tested, or remediated. This special permit provides relief from the Federal pipeline safety regulations for

the EPNG special permit segments and requires EPNG to comply with certain conditions and limitations designed to maintain pipeline safety.

PHMSA grants this special permit based on the findings set forth in the “Special Permit Analysis and Findings” document, which can be read in its entirety in Docket No. PHMSA-2016-0007 in the Federal Docket Management System (FDMS) located on the internet at [www.Regulations.gov](http://www.Regulations.gov).

My staff would be pleased to discuss this matter or any other regulatory matter with you. Mr. John Gale, Director of Standards and Rulemaking Division may be contacted at 202-366-0434, on regulatory matters and Mr. Kenneth Lee, Director of Engineering and Research Division, may be contacted at 202-366-2694, on technical matters specific to this special permit application.

Sincerely,



Alan K. Mayberry  
Acting Associate Administrator  
for Pipeline Safety

Enclosure: Special Permit – PHMSA-2016-0007