U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION

Special Permit Analysis and Findings
Class 1 to 3 Location

Special Permit Information:

Docket Number:	PHMSA-2016-0007
Requested By:	El Paso Natural Gas Company, LLC
Operator ID#:	4280
Original Date Requested:	January 11, 2016
1st Renewal Issuance Date:	March 17, 2023
Code Section(s):	49 CFR 192.611(a) and (d), 192.619(a), and 192.5

Purpose:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) provides this information to describe the facts of the subject special permit application submitted by El Paso Natural Gas Company, LLC[1] (EPNG), to discuss any relevant public comments received with respect to the application, to present the engineering/safety analysis of the special permit application, and to make findings regarding whether the requested special permit should be granted and if so under what conditions. EPNG requests that PHMSA waive compliance from 49 Code of Federal Regulations (CFR) 192.611(a) and (d), 192.619(a), and 192.5 for 16 ***special permit segments*** of approximately 4.214 miles of natural gas transmission pipeline segments.

Pipeline System Affected:

This special permit request applies to 16 ***special permit segments*** of natural gas transmission pipeline operated by EPNG and located in the states of Arizona, New Mexico, and Texas where a change has occurred from an original Class 1 location to a Class 3 location. This special permit allows EPNG to continue to operate the 16 pipeline segments and 4.214 miles at their

[1] El Paso Natural Gas Company, LLC (EPNG) is owned by Kinder Morgan, Inc.

current maximum allowable operating pressure (MAOP) shown in pounds per square inch gauge (psig).

Special Permit Request:

EPNG applied to PHMSA on March 4, 2021, for a renewal of a previously granted special permit seeking relief from the Federal pipeline safety regulations in 49 CFR 192.611(a) and (d), 192.619(a), and 192.5 for 16 segments and 4.214 miles of natural gas transmission pipeline as described in Appendix A of the Special Permit Conditions. The ***special permit segments*** are located in the states of Arizona, New Mexico, and Texas, and are identified using EPNG station references of mile post (MP) and station (SS).

Special permit segments are divided into two (2) categories: ***Type A special permit segments*** and ***Type B special permit segments***.

- ***Type A special permit segments*** include those ***special permit segments*** as described in **Table 1 – Type A Special Permit Segments**, where there is a cluster, as described in 49 CFR 192.5(c), of more than 10 buildings intended for human occupancy in a "class location unit" and for which the MAOP has not been confirmed in accordance with 49 CFR 192.611(a) or where the pipe installed has been identified to have a seam type or manufacturer type that is problematic for maintaining pipeline integrity. ***Type A special permit segments*** total approximately 0.618 miles (3,262.41 feet) of pipe in this proposed special permit renewal. ***Type A special permit segments*** must meet **Condition 1(d)** and **Conditions 8(b)(i)** and **(c)** of the Special Permit Conditions.

Table 1 – Type A Special Permit Segments

Special Permit Segment Number[2]	Outside Diameter (inches)	Line Name	Segment Length (feet)[3]	Start Survey Station (MP - SS)	End Survey Station (MP - SS)	County, State	No. Dwellings	Year Installed	Seam Type	External Coating	MAOP (psig)
4 (KM 15)	26	1100	250.23	0471 – 4897	0471 – 5199	Pima, AZ	2	1947	FW	CTE	809
21 (KM 173)	30	1300	831.24	0386 – 3866	0386 – 4697	McKinley, NM	1	1954	FW	CTE	836
25 (KM 281)	26	1100	2,180.94	0204 – 3749	0205 – 648	El Paso, TX	2	1947	FW	CTE	809

Note: **FW** is a flash welded pipe longitudinal seam.

[2] EPNG has not elected to request a renewal for ***special permit segments 6 (KM 21), 7 (KM 22), 8 (KM 23), 9 (KM 24), 10 (KM 25), 11 (KM 26), 12 (KM 27), 14 (KM 29), 15 (KM 30), 20 (KM 172), 22 (KM 174), 23 (KM 175), and 24 (KM 176)***. These segments must now meet the requirements of 49 CFR 192.611(a).

[3] Differences between the actual length and what is calculated from the begin and end station is due to station equations.

CTE is coal tar enamel pipe coating type.

- ***Type B special permit segments*** include those ***special permit segments*** where there is a cluster, as described in 49 CFR 192.5(c), of 10 or fewer buildings intended for human occupancy in a "class location unit" and the MAOP has not been confirmed in accordance with 49 CFR 192.611. ***Type B special permit segments*** total approximately 3.596 miles (18,985.84 feet) of pipe as described in **Table 2 – Type B Special Permit Segments.**

Table 2 – Type B Special Permit Segments

Special Permit Segment Number[4]	Outside Diameter (inches)	Line Name	Length (feet)	Start Survey Station (MP - SS)	End Survey Station (MP - SS)	County or Parish, State	No. Dwellings	Year Installed	Seam Type	External Coating	MAOP (psig)
1 (KM 11)	26	1100	1,412.75	0428 – 5065	0429 – 1197	Cochise, AZ	1	1947	SMLS	CTE	837
2 (KM 12)	26	1100	3,381.29	0430 – 1109	0430 – 4491	Cochise, AZ	6	1947	SMLS	CTE	837
3 (KM 13)	26	1100	1,456.14	0445 – 4824	0446 – 1047	Cochise, AZ	1	1947	SMLS	CTE	837
5 (KM 17)	30	1103	1,448.51	0445 – 4670	0446 – 1038	Cochise, AZ	1	1950	DSAW	CTE	837
13 (KM 28)	34	1204	2,454.82	0254 – 241	0254 – 2696	Coconino, AZ	6	1956	DSAW	CTE	894
16 (KM 31)	36	1208	1,371.77	0254 – 1272	0254 – 2644	Coconino, AZ	1	1992	DSAW	FBE	845
17 (KM 169)	24	1200	87.04	0000 – 5193	0000 – 5280	San Juan, NM	0	1950	DSAW	CTE	845
18 (KM 170)	24	1200	620.54	0002 – 3859	0002 – 4479	San Juan, NM	3	1950	DSAW	CTE	845
19 (KM 171)	24	1201	2,571.93	0002 – 1677	0002 – 4256	San Juan, NM	9	1966	DSAW	CTE	845
26 (KM 282)	30	1103	710.25	0204 – 3758	0204 – 4469	El Paso, TX	1	1950	DSAW	CTE	809
27 (KM 283)	30	1103	924.93	0204 – 5009	0205 – 657	El Paso, TX	1	1950	DSAW	CTE	809
28 (KM 284)	30	2000	1,182.64	0816 – 2998	0816 – 4180	El Paso, TX	1	2003	DSAW	FBE	944
29 (KM 285)	30	2000	1,363.23	0816 – 4218	0817 – 468	El Paso, TX	3	2003	DSAW	FBE	944

Note: **DSAW** is double submerged arc welded pipe longitudinal seam.
SMLS is seamless longitudinal seam.
FBE is fusion bonded epoxy pipe coating type.

- The ***special permit inspection areas*** are defined as the one (1) mile continuous segment on both sides of the ***special permit segment*** plus the footage in the ***special permit segment***. **Table 3 – Type A Special Permit Inspection Areas** and **Table 4 – Type B Special Permit Inspection Areas** list the boundaries for the ***special permit inspection area*** associated with each ***special permit segment***. The EPNG ***special permit inspection areas*** total 36.36 miles of pipe.

[4] ***Type B special permit segment 6 (KM 21)*** had been Federal Register Noticed in the renewal request. On January 6, 2023, EPNG requested the removal of this ***special permit segment*** as it is no longer classified as a Class 3 location due to a decrease in dwellings for human occupancy near ***special permit segment 6*** **(KM 21)**.

Table 3 – Type A Special Permit Inspection Areas					
Special Permit Segment Number	Outside Diameter (inches)	Line Name	Inspection Area Start (MP – SS)	Inspection Area End (MP – SS)	Inspection Area Length (Miles)
4 (KM 15)	26	1100	0470 – 4962	0472 – 5211	2.06
21 (KM 173)	30	1300	0385 – 3934	0387 – 4968	2.21
25 (KM 281)	26	1100	0203 – 3740	0206 – 645	2.41

Table 4 – Type B Special Permit Inspection Areas					
Special Permit Segment Number	Outside Diameter (inches)	Line Name	Inspection Area Start (MP – SS)	Inspection Area End (MP – SS)	Inspection Area Length (Miles)
1 (KM 11)	26	1100	0427 – 5049	0430 - 786	2.27
2 (KM 12)	26	1100	0429 – 1520	0431 – 4892	2.64
3 (KM 13)	26	1100	0444 – 4626	0447 – 350	2.28
5 (KM 17)	30	1103	0444 – 4886	0447 – 373	2.27
13 (KM 28)	34	1204	0253 – 248	0255 – 2885	2.46
16 (KM 31)	36	1208	0253 – 1377	0255 – 2974	2.26
17 (KM 169)	24	1200	0000 – 0	0001 – 5593	2.06
18 (KM 170)	24	1200	0001 – 4270	0004 – 430	2.16
19 (KM 171)	24	1201	0001 – 2082	0004 – 206	2.49
26 (KM 282)	30	1103	0203 – 3792	0205 – 4472	2.13
27 (KM 283)	30	1103	0203 – 5043	0206 – 549	2.18
28 (KM 284)	30	2000	0815 – 3072	0817 – 4346	2.22
29 (KM 285)	30	2000	0815 – 4293	0818 – 542	2.26

Subsequent to the issuance of this special permit, those ***special permit segments*** that have been pressure tested or replaced such that the MAOP has been made commensurate with the present class location as defined in 49 CFR 192.611 would no longer be included in this special permit.

This special permit allows EPNG to continue to operate the ***special permit segments*** at their current maximum allowable operating pressure (MAOP) until either replaced, hydrostatically tested, or operated in accordance with the special permit conditions. The Federal pipeline safety regulations in 49 CFR 192.611(a) require natural gas pipeline operators to confirm or revise the MAOP of a pipeline segment after a change in class location. A special permit would allow EPNG to continue to operate each of the 16 ***special permit segments*** at their existing MAOP's despite a change in class location for the special permit specified time interval.

Public Notice:

On May 27, 2022, PHMSA posted a notice of this special permit request in the Federal Register (87 FR 32231) with a closing date of June 27, 2022. PHMSA has reviewed all public comments received for Docket Number PHMSA-2016-0007. PHMSA received public comments concerning this special permit request that have been addressed in the Final Environmental Assessment and Finding of No Significant Impact (FEA and FONSI).

The EPNG special permit application letter, Federal Register notice, Final Environmental Assessment, Finding of No Significant Impact, and all other pertinent documents are available for review in Docket No. PHMSA-2016-0007 in the Federal Docket Management System (FDMS) located at www.Regulations.gov.

Analysis:

Background: On June 29, 2004, PHMSA published in the Federal Register (69 FR 38948) the criteria it uses for the consideration of class location change waivers, now being granted through special permits. First, certain threshold requirements must be met for a pipeline section to be further evaluated for a class location change special permit. Second, the age and manufacturing process of the pipe; system design and construction; environmental, operating and maintenance histories; and integrity management program elements are evaluated as significant criteria. These significant criteria are presented in matrix form and can be reviewed in the FDMS, Docket Number PHMSA–RSPA-2004-17401. Third, such special permits will only then be granted when pipe conditions and the operator's integrity management program provides a level of safety equal to a pipe replacement or pressure reduction.

Threshold Requirements: Each of the threshold requirements published by PHMSA in the June 29, 2004, Federal Register notice is discussed below in regards to the EPNG special permit petition.

1) No pipeline segments in a class location changing to Class 4 location will be considered. This special permit request is for 16 ***special permit segments*** on the EPNG pipeline system where a class location change has occurred from Class 1 to Class 3 locations as defined in 49 CFR 192.5(c) for cluster locations and segments outside the cluster (and inside the sliding

mile for the class location) where an additional dwelling(s) have been identified. EPNG has met this requirement.

2) No bare pipe will be considered. These EPNG ***special permit segments*** are coated with an external protective coating. EPNG has met this requirement.
3) No pipe containing wrinkle bends will be considered. There are no wrinkle bends in the ***special permit segments***. EPNG has met this requirement.
4) No pipe segments operating above 72% of the specified minimum yield strength (SMYS) will be considered for a Class 3 special permit. The ***special permit segments*** operate at or below 72% SMYS. EPNG has met this requirement.
5) Records must be produced that show a hydrostatic test to at least 1.25 x maximum allowable operating pressure (MAOP). EPNG will pressure test any segments that do not meet this requirement through the special permit conditions.
6) In-line inspection (ILI) must have been performed with no significant anomalies identified that indicate systemic problems. EPNG will meet this requirement through the special permit conditions.
7) Criteria for consideration of class location change waiver, now being granted through special permits, published by PHMSA in the Federal Register (69 FR 38948), define a *waiver inspection area (**special permit inspection area**)* as up to 25 miles of pipe either side of the *waiver segment (**special permit segment**)*. The ***special permit inspection area*** must be inspected according to EPNG's integrity management program and periodically inspected with an in-line inspection technique. The ***special permit inspection area*** extends one-mile out from either side of the ***special permit segments*** and the Class location 3 sliding mile. This additional length was used since the Type B areas that are not being replaced are locations with 10 or fewer buildings intended for human occupancy in a "class location unit" and are outside the original "cluster area." This special permit is contingent upon EPNG's incorporation of each of the ***special permit segments*** in its written integrity management program as a *"covered segment"* in a *"high consequence area"* (HCA) per 49 CFR 192.903.

Criteria Matrix: The original and supplemental data submitted by EPNG for the ***special permit segment*** have been compared to the class location change special permit criteria matrix. The

special permit segments fall in the probable acceptance column of the criteria matrix for all criteria except for:

- Possible acceptance – pipe coating and several leaks within 20-miles of the ***special permit segment***.
- Requires substantial justification - pipe manufacture and pipe material

The data findings below fall within the "possible acceptance and requires substantial justification" columns of the criteria matrix:

1) Pipe design and construction, including pipe manufacture, material and design stress:

- EPNG pipeline ***special permit segments*** have:
    - Pipe manufactured with the following pipe seams: low-frequency electric resistance welded, flash welded, seamless, and double submerged arc welded.
    - Pipe coatings included: coal tar enamel and fusion bonded epoxy.
    - Pipe design stress was 72% specified minimum yield strength or lower.
    - Several leaks within 20-miles of the ***special permit segment***: EPNG will be required to conduct a stress corrosion cracking assessment (SCCDA) of *the* ***special permit segments*** to evaluate where the risk of stress corrosion cracking (SCC) is present. EPNG will be required to implement a plan to improve cathodic protection reliability and perform inspections for SCC during excavations.
- To further address pipe manufacturing, material, construction, pipe coating, SCCDA, and possible pipe leak issues, this special permit will include conditions requiring EPNG to treat all ***special permit segments*** as "covered segments" in an HCA per 49 CFR 192.903.
- EPNG will also be required to perform ILI assessments, anomaly repairs, close interval surveys, identify any pipeline segment that may be susceptible to pipe seam issues because of the vintage of the pipe, the manufacturing process of the pipe, or other issues and SCCDA along the entire length of the ***special permit inspection areas*** and ***special permit segments*** according to the requirements of 49 CFR 192.929 after the grant of this special permit.

- This special permit will include a condition that EPNG must continue to operate each ***special permit segment*** at or below its existing MAOP.

PHMSA has determined that imposing the special permit conditions will address these concerns and provide equivalent safety for these areas.

Operational Integrity Compliance:

To inform PHMSA's decision about whether a special permit could provide a level of safety greater than or equal to a pipe replacement or pressure reduction and is consistent with pipeline safety, PHMSA reviewed this special permit request to understand the known type of integrity threats that are in the ***special permit segments*** and ***special permit inspection areas***. This integrity information was used to consider special permit conditions to provide a systematic program to review and remediate the pipeline for safety concerns. Additional operational integrity review and remediation requirements are required by this special permit to ensure that the operator has an ongoing program to locate and remediate safety threats. These threats to integrity and safety include any issues with the pipe coating quality, cathodic protection effectiveness, operations damage prevention program, pipe depth of soil cover, weld seam and girth weld integrity, anomalies in the pipe steel and welds, and material and structures either along or near the pipeline that could cause the cathodic protection system to be ineffective. PHMSA has carefully designed a comprehensive set of conditions that EPNG must implement to comply with this special permit.

Past Enforcement History – January 1, 2011 through July 31, 2022:

During January 1, 2011 through July 31, 2022, EPNG was cited in 18 enforcement actions with a total of $307,400 in assessed civil penalties. PHMSA issued one (1) Corrective Action Order, three (3) Notice of Amendments, five (5) Notice of Probable Violations, and nine (9) Warning Letters to EPNG

. **Tables 5 and 6** below shows PHMSA's enforcement actions and civil penalties for EPNG:

Table 5: EPNG Enforcement Matters from January 1, 2011 through July 31, 2022						
Status	**Corrective Action Order**	**Notice of Amendment**	**Notice of Probable Violation**	**Safety Order**	**Warning Letter**	**Total**
CLOSED	0	3	5	0	9	**17**
OPEN	1	0	0	0	0	**1**
Total	**1**	**3**	**5**	**0**	**9**	**18**

Table 6: EPNG Enforcement Civil Penalty Status January 1, 2011 through July 31, 2022				
Proposed	**Awaiting Order**	**Assessed**	**Withdrawn/Reduced**	**Collected**
$473,800		$307,400	$166,400	$307,400

Summary of Enforcement Findings for EPNG includes:

- **Atmospheric Corrosion Control**: General and Monitoring; **External Corrosion Control**: Cathodic Protection, Examination of Buried Pipe, Maintenance and Normal Operations, Monitoring; **Internal Corrosion Control**: Inspection Internal Surface; **Integrity Management**: Continual Process Evaluation and Assessment; **Maintenance**: Compressor Stations-Gas Detection, Compressor Stations-Inspection and Testing of Relief Devices, Compressor Stations-Storage of Combustible Materials, Line Markers, Pressure Limiting and Regulating Stations Inspection and Testing, Relief Devices, Patrolling, Record Keeping, Valve Maintenance; **OME Procedural Manual**: General, Maintenance and Normal Operations; **Operations**: Continual Surveillance, MAOP, Odorization of Gas; **Operator Qualification**: Qualification Program and Recordkeeping; **Public Awareness**: Develop and Implement Public Awareness and Documentation; **Reporting**: Immediate Reporting Incident, Filing Safety Related Conditions Reporting (SRCR);
    - 49 CFR 191.3, 191.5, 191.23, 191.25, 191.619, 92.459, 192.463, 192.465, 192.479, 192.481, 192.605, 192.613, 192.616, 192.619, 192.625, 192.705, 192.707, 192.709, 192.731, 192.735, 192.736, 192.739, 192.743, 192.745, 192.805, 192.807, and 192.937.

Table 7 below shows PHMSA's enforcement actions and civil penalties for EPNG and the specific 49 CFR Parts 191 and 192 violations:

Table 7: Summary of Enforcement Findings from EPNG January 1, 2011 to July 31, 2022					
Notice of Amendment					
OME Procedural Manual	2	Public Awareness	4		
				Notice of Amendment Total:	**6**
Notice of Probable Violation					
Corrosion Control	3	OME Procedural Manual	1	Operation and/or Maintenance	5
Operator Qualifications	1	Public Awareness	1	Reporting	1
				Notice of Probable Violation Total:	**12**
Warning Letter					
Corrosion Control	**12**	OME Procedural Manual	**9**	Operation and/or Maintenance	27
Operator Qualifications	**3**	Public Awareness	**4**	Reporting	3
				Warning Letter Total:	**58**
				Grand Total:	**24**

Summary of Enforcement Findings for the Kinder Morgan Gas Pipelines Companies - CIG, EPNG, NGPL, SNG, Tejas, and TGP:

From January 1, 2011, through July 31, 2022, Kinder Morgan, the operator of SNG, was cited in 64 enforcement actions with a total of $1,077,800 in assessed civil penalties on its Colorado Interstate Gas Company (CIG), El Paso Natural Gas Company (EPNG), Natural Gas Pipeline of America (NGPL), Southern Natural Gas Company (SNG), Tejas Pipeline (Tejas), and Tennessee Gas Pipeline Company (TGP) pipeline systems. PHMSA issued seventeen (17) Notice of Amendments, twenty-two (22) Notices of Probable Violations, twenty-two (22) Warning Letters, one (1) Safety Order, and nine (9) Corrective Action Orders to Kinder Morgan.

Tables 8 and 9 below show PHMSA's enforcement actions and civil penalties for Kinder Morgan on these pipeline systems – CIG, EPNG, NGPL, SNG, Tejas, and TGP - with operator identification numbers (OPID#) 2564, 4280, 13120, 18516, 4900, and 19160.

Table 8: Kinder Morgan Enforcement Matters from January 1, 2011 through July 31, 2022						
Status	**Corrective Action Order**	**Notice of Amendment**	**Notice of Probable Violation**	**Safety Order**	**Warning Letter**	**Total**
CLOSED	5	17	22	1	22	**67**
OPEN	4	0	0	0	0	**4**
Total	**9**	**17**	**22**	**1**	**22**	**71**

Table 9: Kinder Morgan Enforcement Civil Penalty Status January 1, 2011 through July 31, 2022				
Proposed	**Awaiting Order**	**Assessed**	**Withdrawn/Reduced**	**Collected**
$1,461,500	$0	$1,077,800	$383,700	$1,077,800

The type of 49 CFR Part 192 enforcement violations against Kinder Morgan on these six (6) pipeline systems from January 1, 2011 through July 31, 2022 were as follows:

Summary of Enforcement Findings for CIG, EPNG, NGPL, SNG, Tejas, and TGP includes:

- **Atmospheric Corrosion Control**: General and Monitoring; **Construction**: Compliance with Standards; **Control Room Management**: Alarm Management, Fatigue Mitigation, and Roles and Responsibilities; **Design**: Compressor Station Design and Construction, Pressure Relieving and Limiting Stations, and Supports and Anchors; **External Corrosion Control**: Cathodic Protection, Examination of Buried Pipe, Maintenance and Normal Operations, Monitoring, Protective Coating, and Test Stations; **Gas Transportation**: Conversion of Service, and Underground Natural Gas Storage; **Internal Corrosion Control**: General, Inspection Internal Surface, and Records; **Integrity Management**: Addressing Integrity Issues, Continual Process Evaluation and Assessment, High Consequence Area Identification, Preventative and Mitigative Measures, Program Elements, and Threat Identification; **Maintenance**: Compressor Stations-Gas Detection, Compressor Stations-Inspection and Testing of Relief Devices, Compressor Stations-Storage of Combustible Materials, Leak Surveys, Line Markers, Permanent Field Repair of Damage, Pressure Limiting and Regulating Stations Inspection and Testing, Relief Devices, Patrolling, Record Keeping, and Valve Maintenance; **OME Procedural Manual**: Emergency Plans, General, Maintenance and Normal Operations, Safety Related Conditions Reporting (SRCR); **Operations**: Change in Class Location, Continual Surveillance, Emergency Plans, General, MAOP, Odorization of Gas, and Overpressure Safety Devices; **Operator Qualification**: Qualification Program and Recordkeeping; **Public Awareness**: Develop and Implement Public Awareness and Documentation; **Reporting**: Incident Reports, Immediate Reporting Incident, Filing SRCR, Offshore Pipeline Condition Report; **Welding**: Limitations on Welders, Procedures, and Qualifications.
    - 49 CFR 191.3, 191.5, 191.15, 191.22, 191.23, 191.25, 191.27, 191.605, 192.3, 192.12,

192.14, 192.161, 192.163, 192.199, 192.201, 192.225, 192.227, 192.229, 192.303, 192.436, 192.459, 192.461, 192.463, 192.465, 192.469, 192.475, 192.479, 192.481, 192.491, 192.603, 192.605, 192.611, 192.613, 192.615, 192.616, 192.619, 192.625, 192.631, 192.705, 192.706, 192.707, 192.709, 192.713, 192.731, 192.735, 192.736, 192.739, 192.743, 192.745, 192.805, 192.807, 192.905, 192.911, 192.917, 192.921, 192.933, 192.935, and 192.937.

Table 10 below gives a complete summary of the findings and the specific 49 CFR Parts 191 and 192 violations:

Table 10: Summary of Enforcement Findings for CIG, EPNG, NGPL, SNG, Tejas, and TGP January 1, 2011 through July 31, 2022					
Notice of Amendment					
Construction	**1**	Control Room Management	**4**	Integrity Management	**10**
OME Procedural Manual	**11**	Operation and/or Maintenance	**2**	Operator Qualification	**3**
Public Awareness	**8**	Reporting	**3**	Transportation of Gas	**5**
Welding of Steel in Pipelines	**3**				
				Notice of Amendment Total:	**50**
Notice of Probable Violation					
Control Room Management	**1**	Corrosion Control	**13**	Design	**2**
Integrity Management	**10**	OME Procedural Manual	**14**	Operation and/or Maintenance	**26**
Operator Qualification	**7**	Public Awareness	**2**	Reporting	**5**
Welding of Steel in Pipelines	**1**				
				Notice of Probable Violation Total:	**81**
Warning Letter					
Corrosion Control	**11**	Design	**1**	Integrity Management	**1**
OME Procedural Manual	**10**	Operation and/or Maintenance	**31**	Operator Qualification	**2**
Public Awareness	**4**	Reporting	**1**	Transportation of Gas	**1**
				Warning Letter Total:	**62**
				Grand Total:	**193**

Findings:

Based on the information submitted by EPNG and PHMSA's analysis of the technical, operational, and safety issues, PHMSA finds that granting this special permit with conditions

that requires EPNG to operate the 16 ***special permit segments*** on the 24-inch diameter, 26-inch diameter, 30-inch diameter, 34-inch diameter, and 36-inch diameter Pipelines located in Cochise and Pima Counties, Arizona; McKinley and San Juan Counties, New Mexico; and El Paso County, Texas at their current MAOP for a Class 1 to Class 3 location change segment is consistent with pipeline safety.

PHMSA has designed the special permit conditions to effectively assess and remediate threats to the ***special permit segments*** and ***special permit inspection areas***, including pressure testing, obtaining pipe material records, and conducting assessments to evaluate pipe girth welds that have not been non-destructively tested, any pipe with missing material records, and SCC. To ensure EPNG properly implements the special permit conditions, EPNG will be required to give PHMSA an annual review of their compliance with the special permit.

PHMSA finds the issuance and full implementation of this special permit that waives the requirements of 49 CFR 192.611(a) and (d), 192.619(a), and 192.5 for a Class 1 location change to a Class 3 location is not inconsistent with pipeline safety. This special permit requires EPNG to implement the special permit conditions that include safety requirements on the operations, maintenance, and integrity management of the ***special permit segments*** and the ***special permit inspection areas***. EPNG will be required to implement the special permit conditions along the ***special permit segments*** and ***special permit inspection areas*** in pipeline segments that are not high consequence areas and would not normally be required by 49 CFR Part 192 to be assessed on a periodic interval for threats.

Completed in Washington DC on: March 17, 2023.
Prepared by: PHMSA - Engineering and Research Division