

**NOTICE OF AMENDMENT**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

July 3, 1997

Mr. H. Rickey Wells  
Vice President - Operations  
K N Energy, Inc.  
P.O. Box 281304  
Lakewood, Co 80228

CPF No. 37113

Dear Mr. Wells:

During July 22 through 27, 1996, representatives of the Central Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite safety inspection of your pipeline facilities and records within the Albion and Grand Island, Nebraska areas.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The items inspected and the probable violation are:

**1. § 192.615 Emergency plans.**

**(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum the procedure must provide for the following:**

**(4) The availability of personnel, equipment, tools, and materials as need at the scene of an emergency.**

Review of KN Interstate Gas Transmission's (KNIGT) Emergency Plan manual found the procedures were missing or in adequate, as noted below.

When KNIGT was asked to show where this requirement was covered, no applicable procedure could be made available. A two page spread sheet headed by Phillipsburg entitled C&M Equipment was offered. This document listed equipment and its general condition, as well as recommendation for the disposition of the equipment. It was not satisfactory as a list of equipment needed at a site of an emergency.

In regard to the deficiencies in your written procedures for operations, maintenance, and emergencies, the Office of Pipeline Safety is issuing to you a Notice of Amendment requiring that your procedures be amended to comply with the requirements of the regulations referenced.

When it is found that an operator's procedures are inadequate, 49 C.F.R. §190.237 provides that the operator, after notice and opportunity for hearing, may be required to amend its plans and procedures. This letter serves to provide you with the notice of inadequate procedures and the response options as prescribed under §190.237. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request a hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, you must prepare the appropriate amendments and provide a copy to the Director, Central Region, within thirty (30) days of receipt of this notice.

Please refer to CPF No. 37113 in any correspondence or communication on this matter.

Sincerely,

Ivan A. Huntoon  
Director, Central Region  
Office of Pipeline Safety