

SFPP, L.P.

Operating Partnership

November 23, 2005

Ms. Julia Souder
Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington DC 20585

Subject: September 28, 2005 Federal Register Notice of Intent to Prepare a Programmatic Environmental Impact Statement (PEIS), Amend Relevant Agency Land Use Plans, Conduct Public Scoping Meetings, and Notice of Floodplain and Wetlands Involvement

Dear Ms. Souder:

Kinder Morgan Energy Partners (KMEP) recently became aware of the above referenced Federal Register Notice. We appreciate the opportunity to comment and submit pipeline corridors for your consideration.

KMEP is a member of the American Petroleum Association (API) and the Association of Oil Pipelines (AOPL), and supports the API/AOPL letter of November 23, 2005, on this subject. We feel that consideration should be given to designating all of the existing interstate and intrastate pipeline infrastructure systems as identified in the Department of Transportation's (DOT) National Pipeline Mapping System as energy corridors.

KMEP submits the below listed pipeline systems for inclusion in the Programmatic Environmental Impact Statement project. These pipeline systems are shown on the enclosed maps.

Colton CA – Las Vegas NV

Colton CA - Phoenix AZ

Rocklin CA - Reno NV

Rocklin CA - Chico CA

Concord CA - Fresno CA

Concord CA - San Jose CA

Carson CA - San Diego CA

Portland OR - Eugene OR

Portland OR - Pasco WA

Because we have only recently become aware of the PEIS project, the above list may not be all inclusive of KMEP pipeline systems that are critical to the nation's pipeline transportation infrastructure. We would welcome the opportunity to work with the agency in developing a more complete list in a format acceptable to the agency. Thus we respectfully request a 90-day extension to provide the needed information.

The following comments are submitted for your consideration related to the PEIS:

- KMEP is a major common carrier liquid petroleum transportation system serving refiners, traders, marketers and military shippers in the western United States including Arizona, California, Nevada, New Mexico, and Oregon. In addition, KMEP operates pipeline and terminal facilities in 35 states which may be included in future similar governmental EIS permitting projects.
- KMEP pipeline systems and related pipeline corridors are significant to serving critical market areas including but not limited to Phoenix AZ., Tucson AZ., San Diego CA, Sacramento CA Fresno CA, Chico CA, Reno NV, Las Vegas NV, and Eugene OR. Supply of liquid petroleum products including motor gasoline, jet fuel, and diesel fuel is critical to the U.S. military, emergency response organizations such as police and fire departments, as well as industrial and commercial entities and the general public. Recent history with hurricanes in the southeast has shown that interruptions of pipeline operations can negatively impact product supply.
- The U.S. Department of Transportation is the primary federal agency regulating pipeline transportation including oversight of pipeline safety, construction, maintenance, repair, etc. In addition there are numerous other federal, state, and local entities that regulate environmental, tariff, and other pipeline related matters.
- KMEP constructs, operates and maintains pipeline systems in accordance with applicable governmental regulations, industry standards (such as API), and generally accepted industry practice.
- The EIS should address issues associated with the required working space required for original installation of the pipeline as well as the final permanent right of way width. In addition, necessary space for the maintenance and/or replacement of pipeline sections should be addressed.
- The EIS should address a provision for a categorical exemption for permits associated with required pipeline maintenance. It is noted that DOT and other federal agencies are presently working on a permit streamlining process for pipeline maintenance projects. This project includes Best Management Practices involving size of involved footprint, vegetation management, etc.

Other EIS pipeline issues can be discussed during the comment extension period if granted.

Thank you for your consideration. If you would like to discuss any of these items in more detail please contact Ron McClain at 713-369-9152 or Jerry Engelhardt at 714-560-4870.

Sincerely,

Jerry M. Engelhardt

Jerry M. Engelhardt

For: Ron McClain

Vice President Operations and Engineering

cc: T. A. Bannigan, President

Enc: Maps

















