



## O'NEIL LAW LLC

Experience | Integrity | Solutions

SHAWN M. O'NEIL  
ATTORNEY AND MEDIATOR  
LICENSED IN OREGON & WASHINGTON  
8755 SW CITIZENS DRIVE, SUITE 202  
WILSONVILLE, OR 97070  
T 503.570.8755 | F 503.570.8757  
SMO@SHAWNONEIL.COM | WWW.SHAWNONEIL.COM

March 11, 2015  
By Email Only  
Ms. Karly Payne  
Kinder Morgan Pipeline  
1100 Town and Country Rd #600,  
Orange, CA 92868

Re: Kinder Morgan Pipeline

Dear Ms. Payne:

Thank you for taking my phone call. I am writing on behalf of concerned citizens within the State of Oregon. I am requesting to obtain and if necessary inspect copies of records pertaining to the Kinder Morgan Pipeline (the "Pipeline") that runs from the Kinder Morgan Willbridge facility in Portland, Oregon to the Kinder Morgan facility in Eugene, Oregon.

The documents requested are limited to the State of Oregon. I would prefer Electronic PDF format and JPEG imagery if at all possible. I am requesting as follows:

1. A complete copy of the current Kinder Morgan Energy Spill Contingency Plan with regard to the Pipeline.
2. A complete copy of the current disaster response plan your agency has to address/respond to issues associated with the rupture or damage to the Pipeline.
3. A complete copy of any disaster plan created by Kinder Morgan and provided to State and Local Agencies on how Kinder Morgan intends to coordinate with state, federal, and local agencies.
4. All documents evidencing the meetings between Kinder Morgan representative(s) and State and local governments and emergency response agencies concerning Pipeline Safety, emergency or disaster planning concerning a pipeline rupture, leak or contamination.
5. All documents that identify the age of every portion of the Pipeline including all welded connection points.

March 11, 2015  
Ms. Karly Payne  
Re: Kinder Morgan Pipeline

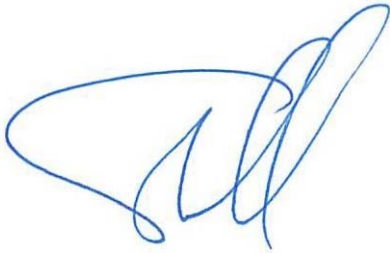
6. All documents recording all smart pig internal inspections of the line that have occurred from 1997 to the present including results of such inspections.
7. All documents pertaining to any other testing done on the Pipeline from 1997 to present to identify structural integrity and corrosion.
8. All documents identifying any other monitoring of the safety and integrity of the Pipeline.
9. All documents identifying disaster/emergency response drills conducted by Kinder Morgan on its own and jointly with federal, state and local agencies regarding potential pipeline related emergencies.
10. All documents evidencing the application of a cathodic protection to the Pipeline after 1997.
11. All documents evidencing any type of protective coating placed on the Pipeline.
12. All documents identifying the current depth of the Pipeline underground taking into account erosion, farming, and building that has occurred since 1962.
13. All documents pertaining to soil/water samples taken from or near the Pipeline path of travel since 1997.
14. All documents provided by Kinder Morgan to local governments situated along the Pipeline's path.
15. All documents evidencing all investigations, reports, and findings prepared by Kinder Morgan or any third party or entity concerning the integrity of the Pipeline.
16. All documents evidencing any technical assistance, compliance inspections, investigations of complaints, warning letters, assessments of civil penalties, or compliance orders concerning Kinder Morgan and the Pipeline.
17. All documents that contain information concerning the current pressure and volume of fuel being transported through the Pipeline.
18. All documents that contain information concerning the current state and federal standards regarding the life cycle of piping materials identical to or substantial to the materials contained in the Pipeline.

March 11, 2015  
Ms. Karly Payne  
Re: Kinder Morgan Pipeline

19. A copy of all current state and federal welding standards with respect to welding and material requirements required at pipeline connection points for refine petroleum pipelines identical to or substantially similar to the Pipeline.
20. A copy of all documents that you have in your possession and control concerning the testing of the integrity of the Pipeline including testing done in Washington and Clackamas Counties, Oregon.

Thank you for your anticipated cooperation in providing this information.

Very truly yours,

A handwritten signature in blue ink, appearing to read "S. O'Neil", with a large, stylized initial "S" and "O".

Shawn M. O'Neil