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February 15, 2017

NEB File No.: OF-Fac-Oil-K077-2016-04 01

*Via E-Filing*

National Energy Board  
Suite 210, 517 – 10<sup>th</sup> Ave SW  
Calgary, AB T2R 0A8

**Attention: Ms. Sheri Young, Secretary of the Board**

Dear Ms. Young:

**Re: Kinder Morgan Cochin ULC (“Kinder Morgan”)  
Application for Regina Highway Bypass Relocation Project (“Project”)  
Request for Variance from National Energy Board Orders XO-K077-016-2016 & MO-055-2016  
 (“Orders”) Conditions - Pipeline Wall Thickness**

On 14 December 2016, the National Energy Board (“NEB”) issued Order XO-K077-016-2016 and Order MO-055-2016 for the above noted Project. Condition 1 and Condition 2 of Order XO-K077-016-2016 provide as follows:

1. Kinder Morgan shall comply with all of the conditions contained in this Order unless the Board otherwise directs.
2. Kinder Morgan shall cause the approved Project to be designed, located, constructed, installed, and operated in accordance with the specifications, standards, commitments made and other information referred to in its application or in its related submissions.

Condition 1 and Condition 2 of Order MO-055-2016 provide as follows:

1. Kinder Morgan shall comply with all of the conditions contained in this Order unless the Board otherwise directs.
2. Kinder Morgan shall deactivate and maintain the Cochin Pipeline in its deactivated state in accordance with the specifications, standards, commitments made and other information referred to in its application or in its related submissions.

Due to difficulties encountered by Kinder Morgan in procuring the pipe grade material with the specified wall thickness of 7.80 mm, Kinder Morgan requests variance from Conditions 1 and 2 of the Orders to allow for a change in the pipe wall thickness of the pipeline from 7.80 mm to 9.30 mm, with 9.30 mm being a heavier walled pipe. Kinder Morgan confirms that the heavier walled pipeline proposed herein

meets the strength and temperature rating requirements of the Project. Kinder Morgan provides in Attachment A the requested revisions to the Schedule A's of the Orders.

Kinder Morgan also notes that associated with the proposed change in pipe wall thickness, it proposes to use segmentable elbow components with wall thicknesses of 9.3 mm and 12.7 mm, due to difficulties encountered in procuring these elbows with a 7.80 mm wall thickness. CSA Z662-15, Clause 7.3.1.2 allows for the joining of pipe and / or components (elbows) of unequal wall thickness, so long as the Buttweld details are as-per the requirements shown and discussed in Figure 7.2. Kinder Morgan confirms that the design and construction utilizing these elbows will adhere to the requirements of CSA Z662-15, Clause 7.3.1.2 & Figure 7.2. No other aspect of the Application is affected by this proposed variance.

Should you have any questions regarding this matter, please do not hesitate to contact the undersigned.

Yours truly,

**KINDER MORGAN COCHIN ULC**



Nathan Zaseyvida  
Assistant General Counsel

Enclosures

**SCHEDULE A**  
**National Energy Board XO-K077-016-2016**

**Kinder Morgan Cochin ULC**  
**Application dated 14 October 2016**  
**assessed pursuant to section 58 of the *National Energy Board Act***

**Regina Highway Bypass Relocation Project**  
**File OF-Fac-Oil-K077-2016-04 01**

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Pipeline Specifications – Cochin Pipeline

<b>Project Type</b>	New construction			
<b>Location (endpoints)</b>	From NW 20-17-20 W2M To NW 20-17-20 W2M		From NW 20-17-20 W2M To SE 19-17-20 W2M	
<b>Approximate Length</b>	0.53 km	0.53 km	0.42 km	0.42 km
<b>Outside Diameter</b>	273.10 mm (NPS 10)			
<b>Wall Thickness</b>	<del>7.80 mm</del> 9.30 mm			
<b>Pipe Material</b>	Carbon steel			
<b>Pipe Material Standard</b>	CSA Z245.1			
<b>Pipe Grade</b>	Grade 359			
<b>External Coating Type</b>	Fusion-bond epoxy			
<b>Maximum Operating Pressure</b>	9928.00 kPa			
<b>Product</b>	Crude oil			

**SCHEDULE A**  
**National Energy Board MO-055-2016**

**Kinder Morgan Cochin ULC**  
**Application dated 14 October 2016**  
**assessed pursuant to section 44 of the *National Energy Board Onshore Pipeline Regulations***

**Regina Highway Bypass Relocation Project**  
**File OF-Fac-Oil-K077-2016-04 01**

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Pipeline Specifications – Cochin Pipeline

<b>Project Type</b>	Deactivation			
<b>Location (endpoints)</b>	From NW 20-17-20 W2M To NW 20-17-20 W2M		From NW 20-17-20 W2M To SE 19-17-20 W2M	
<b>Approximate Length</b>	0.53 km	0.53 km	0.42 km	0.42 km
<b>Outside Diameter</b>	273.10 mm (NPS 10)			
<b>Wall Thickness</b>	<del>7.80 mm</del> 9.30 mm			
<b>Pipe Material</b>	Carbon steel			
<b>Pipe Material Standard</b>	CSA Z245.1			
<b>Pipe Grade</b>	Grade 359			
<b>External Coating Type</b>	Fusion-bond epoxy			
<b>Maximum Operating Pressure</b>	50 PSI			
<b>Product</b>	Nitrogen			