APPENDIX B to Consent Decree
United States v. Kinder Morgan Altamont LLC and Colorado Interstate Gas Company, L.L.C.

Audit Methodology

1. Timing. Within ninety (90) Days of the Effective Date of the Consent Decree, Settling Defendants shall give each Auditor a copy of the Consent Decree (including all appendices) to which this Appendix B is attached, as well as all other information and access necessary to complete the one-time Mechanical Integrity Compliance Audits required in the Consent Decree in Paragraph 14.

2. Selection of Equipment to be Audited. Settling Defendants' Auditor shall select the equipment to be audited from a combination of document reviews; e.g., plant Piping and Instrumentation Diagram (P&ID) sheets, Process Flow Diagrams, and supporting equipment documentation and on-site field observations. The compliance documentation and supporting information for the equipment selected shall consist of:

   a. Plant P&ID/Process Flow Diagram sheets – These documents illustrate the locations of the RMP covered pressure vessels and storage tanks, piping systems, relief and vent systems and devices, emergency shutdown systems, controls, and pumps in the respective plants;

   b. Plant Condition Management Software (PCMS) – PCMS provides the internal and external visual inspection history, the external thickness history, both short-term and long-term corrosion rates, next inspection due dates and worse-case retirement dates based on the corrosion history for the Risk Management Program (RMP) covered pressure vessels, storage tanks and piping systems in the respective plants. PCMS is

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linked to Maximo to create work orders for the inspection and maintenance work scheduling and completion history for the specified RMP covered equipment;

c. Maximo – Used to create work orders for the inspection and maintenance scheduling and work completion history for the RMP covered relief and vent systems and devices, emergency shutdown systems, controls, and pumps;

d. Inspection Testing and Preventive Maintenance (ITPM) – The ITPM plan provides guidance and consistency in defining ITPM tasks for the RMP covered locations in order to assess the mechanical integrity of the equipment in the regulated processes and help prevent failures by restoring the equipment condition. The plan summarizes the recommended ITPM tasks for the equipment and was developed from RAGAGEP and input from personnel knowledgeable in developing and implementing the mechanical integrity program.

3. Audit Sample Size. The Auditor may use a sampling methodology to examine compliance with 40 C.F.R. §§68.73(b), (c), (d), and (e) for RMP covered equipment at each of Defendants' RMP Sources. If the Auditor elects to use a sampling methodology, the sample size shall meet the criteria of Column A from Table 2-4 of the Center for Chemical Process Safety ("CCPS") Manual "Guidelines for Auditing PSM Systems." The only circumstance under which the Auditor may complete an audit of a population smaller than the sample size specified in Column A from Table 2-4 shall be the circumstance in which the Auditor concludes, based on the Auditor's experience and professional judgment and the pattern of results of the audit, that

sufficient information has emerged for the Auditor to conclude that the entire sample population is in non-compliance with the applicable regulatory requirements. Under such circumstances, the Auditor need not continue the audit for that population and shall identify the entire sample as subject to corrective action as required by the Consent Decree.