

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 14, 2013

Mr. Robert Cronk
Vice President, Technical Services
Williams Field Services – Gulf Coast
One Williams Center
Tulsa, Oklahoma 74101

CPF 4-2013-9001W

Dear Mr. Cronk:

A representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code have reviewed your notification that was submitted to PHMSA. As a result of this review, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

1. §191.22 National Registry of Pipeline and LNG Operators.

(c) Changes. Each operator of a gas pipeline, gas pipeline facility, LNG plant or LNG facility must notify PHMSA electronically through the National Registry of Pipeline and LNG Operators at <http://opsweb.phmsa.dot.gov>, of certain events.

(1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:

- (i) Construction or any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility other than a section of line pipe, that costs \$10 million or more. If 60 day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable;**
- (ii) Construction of 10 or more miles of a new hazardous liquid pipeline;**

Williams Field Services did not submit an Operator Registry Notification, PHMSA F 1000.2 60 days before the start of construction of the offshore gas pipeline.

PHMSA received a New Construction Notification that Williams Field Services is to construct a 17 mile offshore gas pipeline in the Gulf of Mexico. The information that was submitted states that “The natural gas gathering offshore export pipeline will transport gas the Gulfstar 1 FPS SPAR located in the Mississippi Block 724 to the existing Blind Faith export pipeline system located in Mississippi Block 728. The new construction is 12-inch diameter pipe and consists of a 1 mile SCR section that ties in to the existing Canyon Chief 18-inch gas pipeline system.” The date of the notification was May 3, 2013. The date of the ‘Anticipated start date of field construction activities’ was dated May 13, 2013.

Through conversations with company personnel, this office understands that Williams Field Services started construction activities on May 13, 2013. The Notification was received 10 days before the construction date.

2. §195.64 National Registry of Pipeline and LNG Operators.

(c) Changes. Each operator must notify PHMSA electronically through the National Registry of Pipeline and LNG Operators at <http://opsweb.phmsa.dot.gov>, of certain events.

(1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:

- (i) Construction or any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility other than a section of line pipe, that costs \$10 million or more. If 60 day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable;**
- (ii) Construction of 10 or more miles of a new hazardous liquid pipeline;**
- (iii) Construction of a new pipeline facility.**

Williams Field Services did not submit an Operator Registry Notification, PHMSA F 1000.2 60 days before the start of construction of the offshore liquid pipeline.

PHMSA received a New Construction Notification that Williams Field Services is to construct a 17 mile offshore crude oil pipeline in the Gulf of Mexico. The information that was submitted states that “The crude oil offshore export pipelines will transport oil from the Gulfstar 1 FPS SPAR located in Mississippi Block 724 to the existing Blind Faith export pipeline system located in Mississippi Block 728. The pipeline is 12-inch diameter and consists of a 1 mile SCR section. The oil export ties into the existing Mountaineer 18-inch oil pipeline system.” The date of the notification was May 3, 2013. The date of the ‘Anticipated start date of field construction activities’ was dated May 13, 2013.

Through conversations with company personnel, this office understands that Williams Field Services started construction activities on May 13, 2013. The Notification was received 10 days before the construction date.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Williams Field Services – Gulf Coast being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 4-2013-9001W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Compliance Proceedings