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One Williams Center  
P.O. Box 2400  
Tulsa, OK 74102-2400

August 25, 2016

Mr. Rod Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
Department of Transportation – Office of Pipeline Safety  
8701 South Gessner Drive, Suite 1110  
Houston, Texas 77074

RE: CPF-4-2016-1008; Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order (“Notice”)

Dear Mr. Seeley:

Enclosed please find the Response of Williams Partners, L.P. (“Williams”) to the subject Notice.

As stated in the Response, Williams requests an informal meeting in late September to discuss a proposed consent order which would resolve the issues in the Notice without the need for further administrative proceedings or litigation. We look forward to your response to this request.

Please contact the undersigned at (918)573-2649 or [John.Suchar@williams.com](mailto:John.Suchar@williams.com) should you wish to discuss this matter or have any questions.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "John Suchar". The signature is stylized with a large loop at the end.

John Suchar  
Director – EHS  
Williams Partners, L.P.

cc: Stephanie Timmermeyer

enclosure

**U.S. DEPARTMENT OF TRANSPORTATION  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION  
OFFICE OF PIPELINE SAFETY**

	)	
In the matter of	)	<b>CPF-4-2016-1008</b>
Williams Partners, L.P.	)	<b>RESPONSE TO NOTICE OF PROBABLE VIOLATION,</b>
Respondent	)	<b>PROPOSED CIVIL PENALTY AND PROPOSED</b>
	)	<b>COMPLIANCE ORDER</b>
	)	

On July 29, 2016 Williams Partners, L.P. (Williams) received the subject Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order (Notice) from the Pipeline and Hazardous Materials Safety Administration (PHMSA), concerning an incident that occurred on October 8, 2015 at its Compressor Station 62 facility (Incident), which is operated by Transcontinental Gas Pipe Line Company, LLC (Transco), a subsidiary of Williams.

In order to resolve the Proposed Compliance Order and other issues contained in the Notice without the need for further administrative proceedings or litigation, Williams respectfully requests an informal meeting to discuss potential terms of a consent order pursuant to 49 C.F.R. §190.219. We propose that this meeting occur towards the end of September 2016.

Williams is confident that the issues associated with this matter can be resolved expeditiously as proposed above. However, in the event that the proposed consent order cannot be reached, Williams requests a hearing on the subject Notice of Probable Violation, Notice of Proposed Civil Penalty and Proposed Compliance Order. If such a hearing does become necessary, Williams respectfully requests that PHMSA not set a date for the hearing until after the parties meet to discuss the proposed consent order. Furthermore, should there be a hearing, Williams will be represented by counsel.

In the event of a hearing, pursuant to 49 C.F.R §190.211, Williams intends to present the following issues:

- Notice of Probable Violation No.1 - The facts of the Incident as found by Williams do not support a finding of probable violation of 49 C.F.R. §191.5(b)(4). Further, a finding of violation in this case would only serve to encourage operators to speculate on the number of deaths and injuries when making the initial report, a practice which would conflict with the intended regulatory goal of providing accurate information regarding incidents.
- The Proposed Civil Penalty assessed for Notice of Proposed Violation No. 1 with respect to notification of deaths and injuries under 49 C.F.R. §191.5(b)(4) should be rescinded;
- Notice of Probable Violation No. 2 – The facts as found by Williams do not support the finding that Williams had “detected” the presence of flammable gas in the 42-inch liquids header but despite such knowledge allowed welding to start. Accordingly, the language of the violation should be revised to delete the statement that Williams had detected the presence of gas prior to the start of welding.
- Proposed Compliance Order No. 1 – The facts of the Incident do not warrant a revised procedure for notification of deaths and injuries under 49 C.F.R. §191.5(b)(4).

- Proposed Compliance Order No. 2 – The facts of the Incident do not warrant changes in Williams’ operating and maintenance procedures, but instead indicate the need for changes to improve adherence to those procedures.
- Proposed Compliance Order No. 3 – The facts of the Incident do not warrant changes in Williams’ Hot Work Procedures, but instead indicate the need for changes to improve adherence to those procedures.
- Proposed Compliance Order No. 4 – The facts of the Incident do not warrant changes in Williams’ Operator Qualification Plan, but instead indicate the need for changes to improve adherence to that Plan.  
Proposed Compliance Order No. 5 – The facts of the Incident do not warrant changes in Williams’ Gas Handling Plan, but instead indicate the need for changes to improve adherence to that Plan.

Respectfully submitted,

Williams Partners, L.P.

By:   
Stephanie R. Timmermeyer  
Vice President, Safety & Regulatory Compliance  
(405)727-1812  
Stephanie.Timmermeyer@williams.com

August 25, 2016