



U.S. Department  
of Transportation

**Pipeline and  
Hazardous Materials Safety  
Administration**

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12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 28, 2011

Mr. Randy Newcomer  
Vice President, Operations Performance  
Williams Field Services  
One Williams Center  
Mail Drop WRC-2C  
Tulsa, OK 74172

**CPF 5-2011-5006W**

Dear Mr. Newcomer:

On August 16, 2010, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your PGX HVL pipeline in Parachute, Colorado.

As a result of the inspection, 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. **§195.402 Procedural manual for operations, maintenance, and emergencies.**

**(d) Abnormal operation. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when operating design limits have been exceeded;**

**(5) Periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found.**

Williams Field Services had abnormal operations reports for events on dates May 22, 2010; June 8, 2010; June 11, 2010; July 17, 2010; and August 11, 2010. The reports did not adequately address the requirements of § 195.402(d)(5) for periodically reviewing the effectiveness of the procedures controlling abnormal operation.

2. **§195.412 Inspection of rights-of-way and crossings under navigable waters.**

**(a) Each operator shall, at intervals not exceeding 3 weeks, but at least 26 times each calendar year, inspect the surface conditions on or adjacent to each pipeline right-of-way. Methods of inspection include walking, driving, flying or other appropriate mean of traversing the right-of-way.**

Williams Field Services started operations on the 6-inch segment on April 10, 2008. Williams Field Services did not have a record of pipeline patrol per § 195.412(a) until June 18, 2008.

3. **§195.428 Overpressure safety devices and overfill protection systems**

**(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.**

The date of first operation was July 18, 2008. Regarding pressure control per § 195.428(a), Williams Field Services did not have a record of inspection of tests and calibration on pressure switches until October 2009, and of pressure transmitters until April 17, 2009.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any 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 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 5-2011-5006W**. 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,

A handwritten signature in black ink, appearing to read 'C. Hoidal', written in a cursive style.

Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry  
Claude Allen (#128409)