

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

September 2, 2016

Ms. Stephanie Timmermeyer
Vice President, Safety & Regulatory Compliance
Transcontinental Pipeline Company
Williams Partners, L.P.
One Williams Center
Tulsa, OK 74172

CPF 2-2016-1002W

Dear Ms. Timmermeyer:

On June 6-9, 2016, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your Transcontinental (Transco) pipeline facility in Alabama and Georgia.

As a result of the inspection, it is alleged 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. §192.605 Procedural manual for operations, maintenance, and emergencies. Each operator shall include the following in its operating and maintenance plan:
(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.**

Transco failed to meet the regulation because it did not follow its manual of written procedures for conducting maintenance activities as follows:

1. Transco's Operations & Maintenance Manual, Section 620.15, titled "*Portable Gas Detection Equipment Calibration*," stated that Transco personnel are required to "...perform full calibration checks and maintenance according to the equipment manufacturer's instructions. **Note:** The schedule set forth in the manufacturer's instruction and full calibration tests of gas detection instruments are minimum requirements. Perform functional tests before each use and perform full calibration anytime the accuracy of the instrument reading is questionable."

Records reviewed by PHMSA personnel indicate that a model 46 Hawk leak detection device (Serial Number 07121224) was used to conduct a February 9, 2015 leak survey. Page 12 of the manufacturer's instruction manual for 46 Hawk leak detection instrument provided the following instructions:

***Note:** Provided response testing (bump test) is performed daily, calibration should be performed monthly in a clean air environment.*

The "*Specifications*" section of the manufacturer's instruction manual further stated:

***Tests:** Monthly Calibration testing with 1000 PPM Methane; Daily Response testing recommended*

PHMSA review of records documenting calibration for the above-referenced 46 Hawk device (Transco form titled "*WilSOP Instrument Maintenance Record*") indicates that Transco personnel did not perform the manufacturer-recommended daily response test (bump test) prior to conducting the above-referenced instrumented leak survey. Moreover, the date of calibration for the referenced device, as documented on Transco's form titled "*WilSOP Land Patrol Report*" for the February 9, 2015 instrumented leak survey, was recorded as October 20, 2015, over 8 months after the date of the instrumented leak survey.

2. Transco's Operations & Maintenance Manual, Section 620.15, titled "*Portable Gas Detection Equipment Calibration*," required Transco personnel to "...before beginning the calibration process, ensure the test gas has not expired as the test gas concentration needs to be high enough to trigger the instrument alarm."

Per Transco records documenting the maintenance and calibration of the above-referenced 46 Hawk leak detection device (Transco form titled "*WilSOP Instrument Maintenance Record*"), Transco personnel used expired calibration gas to conduct the daily response test (bump test) for the above-referenced 46 Hawk device. The above-referenced form documents that Gas Lot 2-335-66, with an expiration date of December 20, 2015, was used for several bump tests conducted from January 6 to January 12, 2016.

3. Transco's Operations & Maintenance Manual, Section 60.02.00.16, titled "*Regulator and Overpressure Protection Systems*," stated in Part 2.1.3:

It is the policy of Williams to inspect and test each regulator, relief valve and other overpressure protection device, and high gas pressure shutdown device (electric or pneumatic) used in natural gas service once each calendar year, not to exceed 15 months.

Transco did not inspect and test the overpressure protection (OPP) device at Magnolia (Station 100) once each calendar year, not to exceed 15 months. Transco's Valve A350 at Magnolia (Station 100) was originally installed as a high-pressure shut-in valve, with all the functionality/capability of an OPP device. Transco personnel were not able to produce records to demonstrate that Valve A350 had been inspected as an OPP device, in accordance with its pressure protecting capabilities. Further, Transco personnel stated that Valve A350 was not considered an OPP device prior to the PHMSA inspection, despite its capabilities as installed. Per subsequent discussions with Transco personnel, it is PHMSA's understanding that the subject Transco system is used only intermittently, and that, when in use, the upstream interconnecting pipeline delivers coal seam gas at pressures lower than the Transco system's maximum allowable operating pressure. Transco effectively relied upon the operational characteristics of the upstream interconnecting pipeline to ensure its system was not over pressured.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$205,638 per violation per day the violation persists up to a maximum of \$2,056,380 for a related series of violations. For violation occurring between January 4, 2012 to August 1, 2016, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$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 Transco 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 2-2016-1002W**. 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,
James A. Urisko

Director, Office of Pipeline Safety
PHMSA Southern Region