



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

MAR - 3 2003

Mr. Robert T. Cronk  
Vice President, Technical Services  
Williams Energy Services Company  
1800 South Baltimore Street  
Tulsa, OK 74119

Re: CPF No. 4-2002-5006M

Dear Mr. Cronk:

Enclosed is the Order Directing Amendment issued by the Associate Administrator for Pipeline Safety in the above-referenced case. The Order finds that you have addressed the inadequacies in your procedures that were cited in the Notice of Amendment. Your receipt of the Order Directing Amendment constitutes service of that document under 49 C.F.R. § 190.5.

This enforcement action is now closed.

Sincerely,

Gwendolyn M. Hill  
Pipeline Compliance Registry  
Office of Pipeline Safety

Enclosure

cc: Michael Pearson  
Manager, Pipeline Integrity

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

DEPARTMENT OF TRANSPORTATION  
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION  
OFFICE OF PIPELINE SAFETY  
WASHINGTON, DC 20590

In the Matter of )  
 )  
Williams Energy Services, )  
 )  
Respondent. )  
 )

CPF No. 4-2002-5006M

ORDER DIRECTING AMENDMENT

During March 12-14, 2002, representatives of the Southwestern and Eastern Regions, Office of Pipeline Safety (OPS), inspected Williams Energy Services' (Respondent) integrity management program at Respondent's facility in Tulsa, Oklahoma. As a result of the inspection, the Southwest Regional Director, OPS, issued to Respondent, by letter dated May 15, 2002, a Notice of Amendment (NOA). The NOA alleged inadequacies in Respondent's integrity management program and proposed to require amendment of Respondent's segment identification procedures to comply with the requirements of 49 C.F.R. § 195.452(b).

Respondent responded to the NOA by letter dated June 13, 2002. Respondent did not contest the allegations set forth in the NOA but requested a hearing to discuss the revisions Respondent planned to make to address the cited inadequacies. An informal hearing was held on October 3, 2002 in the Southwestern Regional office. Respondent submitted amended procedures by letter dated November 1, 2002.

FINDING

The NOA alleged that Respondent's segment identification procedures did not include adequate technical justification for -

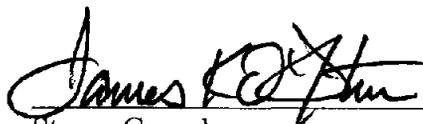
- using a 1000-foot buffer zone to identify high consequence areas that could be affected by a release spread by land or air;
- using the Quest air dispersion model for pipeline analysis;
- using a five-mile downstream buffer to identify areas that could be affected by liquid spills; and
- excluding spill transport analysis by streams within the land buffer.

At the October hearing, Respondent discussed its planned revisions to its segment identification procedures. Respondent explained its analyses and technical justifications used in its identification process and how this information would be included in its revised integrity management program procedures.

In its November 1 submittal, Respondent explained that it modified its identification procedures to reflect that Respondent will analyze each pipeline transporting highly volatile liquids based on dispersion calculations and modeling, and each refined products pipeline based on overland spread calculations and modeling. Respondent has modified its procedures to provide justification for the five-mile downstream buffer zone for waterway crossings and to include spill transport analyses by waterways that intersect or are within the high consequence area buffer zone. Respondent included the amended procedures and technical justifications in its submittal. The Southwestern Region reviewed the revised procedures.

Accordingly, based on the results of this review, I find that Respondent's original integrity management program procedures as described in the NOA were inadequate to ensure safe operation of its pipeline system, but that Respondent has corrected the identified inadequacies. Respondent need not take any further action with respect to the matters in this case.

The terms and conditions of this Order Directing Amendment are effective upon receipt.



for Stacey Gerard  
Associate Administrator  
for Pipeline Safety

MAR - 3 2003

Date Issued