

**NOTICE OF PROBABLE VIOLATION
and
PROPOSED CIVIL PENALTY**

OVERNIGHT EXPRESS DELIVERY

October 31, 2016

Ms. Stephanie Timmermeyer
VP, Safety and Regulatory Compliance
Williams Field Services
525 Central Park Drive
Oklahoma City, OK, 73105

CPF 1-2016-5010

Dear Ms. Timmermeyer:

On May 8, 2014, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code reviewed Williams's Operator Registry Notification G-20140324-4502 dated March 24, 2014.

As a result of this review, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

1. §195.64 National Registry of Pipeline and LNG Operators

(a) . . .

(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: . . .

(ii) Construction of 10 or more miles of a new hazardous liquid pipeline; or

Williams Field Services (Williams) failed to notify PHMSA of its construction of more than 10 miles of new hazardous liquid pipeline before construction occurred, as required by §195.64(c)(1)(ii).

On May 8, 2014, a PHMSA inspector reviewed Williams's construction notification, dated March 24, 2014. Williams submitted the "Type G" (construction of 10 miles or more of line pipe) notification electronically through the online National Registry of Pipeline and LNG Operators website.

Williams stated in the construction notification that it estimated the field construction activities for fifty miles of new hazardous liquid interstate pipeline starting at the Oak Grove Extraction Plant in Moundsville, West Virginia and traveling northeast to the meter and regulator site in Houston, Pennsylvania (Williams Ethane Line) would start on June 11, 2013.

That same day, on May 8, 2014, the PHMSA inspector e-mailed a Williams representative inquiring about the status of the construction of the Williams Ethane Line.

1. A Williams representative responded by e-mail, dated May 9, 2014, stating that the commissioning of the pipeline is currently scheduled near the end of May 2014.
2. Subsequently, in an e-mail dated May 27, 2014, the Williams representative confirmed construction of the Williams Ethane Line began on June 11, 2013.

Accordingly, Williams did not submit this construction notification in a timely manner. Williams was required to submit this construction notification no later than April 12, 2013 (60 days before construction occurred on June 11, 2013), however it was submitted on March 24, 2014. Williams submitted this construction notification 346 days late.

Therefore, Williams failed to comply with the construction notification requirement in §195.64(c)(1)(ii).

Proposed Civil Penalty

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. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation(s), and has recommended that you be preliminarily assessed a civil penalty of \$22,400 as follows:

<u>Item number</u>	<u>PENALTY</u>
1	\$22,400

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. All material submit in response to this enforcement action may be made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), you must provide, along with the complete original document, 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). Not responding within 30 days of receipt of this Notice constitutes a waiver of your right to contest the allegations in this Notice, and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

In your correspondence on this matter, please refer to **CPF 1-2016-5010**, and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Byron Coy, PE
 Director, Eastern Region
 Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*