

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

March 23, 2017

Mark Cluff
Vice President, Safety & Operational Discipline
Williams Field Services Company, LLC
One Williams Center
Tulsa, OK 74172

CPF 1-2017-1008M

Dear Mr. Cluff:

From December 15 to 18, 2015, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected Williams Field Services Company, LLC's (Williams) written specification and records for the construction of an interstate ethane pipeline system (Ohio Valley Midstream (OVM)) in Pittsburgh, Pennsylvania.

Based on the inspection, PHMSA has identified the apparent inadequacies found within Williams's written specifications and standards, as described below:

1. §195.202 Compliance with specifications or standards.

Each pipeline system must be constructed in accordance with comprehensive written specifications or standards that are consistent with the requirements of this part.

Williams's written specification, *Onshore Carbon Steel Pipeline Design, DG-4851, Effective Date: 5/21/2003* did not have adequate instructions to ensure each closure installed in a pipeline system will comply with the ASME Boiler and Pressure Vessel Code, section VII, Pressure Vessel Division I, 2007 edition, July 2007 as prescribed in §195.124.

During this inspection, a PHMSA representative requested to review Williams's written specifications or standards that require closures to comply with the ASME Boiler and Pressure Vessel Code (BPVC), Section VIII, Pressure Vessels, Division 1. Subsequently, Williams provided its *Onshore Carbon Steel Pipeline Design, DG-4851, Section 2.2*, which states that

“pipelines shall be designed and fabricated to comply with the latest revision of all applicable federal, state and local codes, standards and regulations, except as modified to be more stringent by WES’s.” *Section 2.2* also states that the “[c]odes and standards shall include but are not limited to:” and then listed certain industry codes and standards. The PHMSA representative noted that the aforementioned did not reference ASME BPVC, Section VIII, Pressure Vessels, Division 1. At the exit interview, the PHMSA representative discussed with Williams that the *Onshore Carbon Steel Pipeline Design, DG-4851, Section 2.2* did not mention ASME BPVC, Section VIII, Pressure Vessels, Division 1 in accordance with §195.124.

On December 22, 2015, the PHMSA representative sent a follow-up e-mail to Williams regarding the request to review its process that ensures closures met the terms in ASME Boiler and Pressure Vessel Code (BPVC), Section VIII, Pressure Vessels, Division 1. Williams responded on January 8, 2016 stating:

“[T]he design for the project specified that the pipeline would be constructed in accordance with 49 CFR 195 and as well as ASME B31.4. Included in that standard is section 404.7 stating that that the ASME Boiler and Pressure Vessel Code, Section VIII is to be followed for closures. Enclosed is the standard drawing and closure documentation stating that the closures comply with ASME BPVC Section VIII Div 1. Enclosed is a copy of the Closure Drawing and Design Calculations demonstrating its compliance.”

Pursuant to §195.124, ASME BPVC, Section VIII, Division 1, 2007 edition, July 1, 2007 is the edition incorporated by reference, as seen in §195.3. ASME/ANSI B31.4-2009 Pipeline Transportation Systems for Liquid Hydrocarbon and Other (ASME/ANSI B31.4-2009), under the Chapter II, 404.7 does reference ASME BPVC, Section VIII, Division 1 requirements on closures.¹ However, Appendix I of ASME B31.4-2009, which list the specific editions of standards incorporated in that Code, refers to ASME BPVC, 1998 Ed. and 1999 Addenda. This edition is not an approved standard which is incorporated by reference for §195.124.

In addition, Williams’s closure drawing and design calculation records refers to ASME Section VIII Division 1 2010 Edition, Addenda 2011.

Clearly, the reference to ASME B31.4 and Part 195 in *Onshore Carbon Steel Pipeline Design, DG-4851* did not ensure compliance with §195.124.

Thus, Williams’s written specification, *Onshore Carbon Steel Pipeline Design, DG-4851*, did not include adequate instructions to ensure that each closures installed in a pipeline system must comply with the ASME Boiler and Pressure Vessel Code, section VII, Pressure Vessel Division I, 2007 edition, July 2007 as prescribed in §195.124.

2. §195.202 Compliance with specifications or standards.

Each pipeline system must be constructed in accordance with comprehensive written specifications or standards that are consistent with the requirements of this part.

¹ As seen in §195.3, ASME B31.4-2006 Pipeline Transportation Systems for Liquid Hydrocarbon and Other Liquid is an approved incorporated by reference for §§195.110(a) and 185.452(h).

Williams's written specifications and standards were inadequate because it did not include clear, detailed instructions for pipeline location in accordance with §195.210.

During this inspection, a PHMSA representative requested to review written specifications or standards for pipeline location in accordance with §195.210. Subsequently, Williams provided its *Engineering Standard, Document No.: CZ-9019, Form Revision A, Effective Date 10/15/01, Document titled: New Construction Hazardous Liquids Checklist*. Williams indicated that the *New Construction Hazardous Liquids Checklist* is a pre-filled checklist that shows an "X" under a party's responsibility and performance for a specific code sections in 49 C.F.R. Part 195. The PHMSA representative noticed the checklist had a blank space next to the "Project Name," "Project Number," "Approved by," and "Prepared By." The *New Construction Hazardous Liquids Checklist* was incomplete. Moreover, Williams was unable to provide a written specification or standard that referenced this document. During the exit interview, Williams informed the PHMSA representative that the Project Managers for the construction of the OVM confirmed that the *System Integrity Program* did not mention the *New Construction Hazardous Liquids Checklist*. Consequently, the PHMSA representative discussed with Williams the lack of written specification or standard that referenced the *New Construction Hazardous Liquids Checklist*.

On December 22, 2015, the PHMSA representative sent a follow-up e-mail to Williams regarding the request to review a written specification or standard that referenced the *New Construction Hazardous Liquids Checklist*. The PHMSA representative requested the current, official copy of Williams Field Services construction specification or standard, which describes pipeline location in accordance with §195.210. In addition, the PHMSA representative requested a completed copy of the *New Construction Hazardous Liquids Checklist* for the construction of the OVM.

Williams responded on January 8, 2016 stating, "CZ-9019 was not filled out for this project. There is no specific requirement in Williams standards stating this document must be filled out. The copy received in the audit is the current official copy. This form is not mentioned on any other procedure standard or specification. Document CZ-9019 provides the specification."

First, the *New Construction Hazardous Liquids Checklist* did not include information about placing the pipeline "as far as practicable" from areas as prescribed in §195.210. On page 4 of *New Construction Hazardous Liquids Checklist*, it states "§195.210 Pipeline R.O.W. to maintain a minimum distance of 50 feet from: Private dwellings, Industrial buildings, Places of public assembly. Unless the pipe is provided with an additional 12" of cover in addition to the described minimum ground cover stated in this document under 195.248." The *New Construction Hazardous Liquids Checklist* only states the minimum distance allowed.

Second, the *New Construction Hazardous Liquids Checklist* was incomplete. The *New Construction Hazardous Liquids Checklist* did not contain information about the construction of the OVM next to the appropriate fields therein.

Last, William presented the *New Construction Hazardous Liquids Checklist* to the PHMSA representative as a stand-alone document. Williams did not produce a written specification or standard with instructions to use the *New Construction Hazardous Liquids Checklist*.

Therefore, Williams's written specification and standard were inadequate since there was no instructions on which document to use or how it should be filled out for ensuring compliance with §195.210.

3. §195.202 Compliance with specifications or standards.

Each pipeline system must be constructed in accordance with comprehensive written specifications or standards that are consistent with the requirements of this part.

Williams's written specification, *Onshore Carbon Steel Pipeline Installation, ES-4852, Effective Date: 9/30/2015* included a provision that was unclear and inconsistent with §195.248. Pursuant to §195.248, the depth of cover for crossing of inland bodies of water with a width of at least 100 feet (30 millimeters) from high water mark to high water mark must be 48 inches for normal excavation.

During this inspection, a PHMSA representative requested to review written specification or standards for pipeline installed with a depth of cover in accordance with §195.248. Subsequently, Williams provided *Onshore Carbon Steel Pipeline Installation, ES-4852, Section 7.8* which states in part, "[w]hen no cover is specified, the following shall be the minimum: Water Crossing, including Marshes 42 Inches of Cover, Water Crossing 60 Inches of Cover." PHMSA representative noted that there were two "Water Crossing" locations with different inches of cover.

Therefore, the *Onshore Carbon Steel Pipeline Installation, ES-4852, Section 7.8* did not define a "Water Crossing" so that it is clear which requirement meets §195.248.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. 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. 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).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within **30 days** of receipt of this Notice, this 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 an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 90 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Williams Field Services maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Acting Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. In correspondence concerning this matter, please refer to **CPF 1-2017-1008M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Robert Burrough
Acting Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

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