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Williams Field Services
One Williams Center
WRC-2
Tulsa, OK 74172
(405) 626-1785

April 21, 2017

RECEIVED APR 25 2017

Mr. Robert Burrough
Acting Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

RE: CPF 1-2017-1008M

Mr. Burrough:

On March 24, 2017, the Pipeline Safety and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Amendment (Notice) to Williams Field Services Company, LLC (Williams). The Notice identified certain alleged inadequacies in the comprehensive written specifications or standards that Williams used for the construction of the Oak Grove to Houston Ethane Pipeline (Pipeline). PHMSA identified the alleged inadequacies during an inspection that occurred between December 15 and 18, 2015, in Pittsburgh, Pennsylvania.

Williams is fully committed to maintaining the safety of its pipeline facilities and appreciates the opportunity to respond to the Notice. Williams has reviewed the alleged inadequacies and begun the process of addressing the items identified in the Notice as detailed in the below responses. Williams will provide copies of the updated procedures upon comprehensive review and completion.

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.

PHMSA alleges that Williams did not have adequate instructions in its written procedure, "Onshore Carbon Steel Pipeline Design, DG-4851" Section 2.2, to ensure pipeline closures installed comply with ASME Boiler and Pressure Vessel Code, Section VII, Division I, 2007 Edition. Williams understands PHMSA's concerns about ensuring that the correct edition of the code is followed at the time of construction. Accordingly, Williams will update the procedure to specifically reference the ASME Boiler and Pressure Vessel Code, Section VII, Division I, 2007 Edition, in section 2.2 of "Onshore Carbon Steel Pipeline Design, DG-4851" for clarification purposes.

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.

PHMSA alleges that Williams did not have clear detailed instructions for pipeline locations in accordance with the requirements of 49 C.F.R. § 195.210. Section 195.210 (a) provides that "[p]ipeline right-of-way must be selected to avoid, as far as practicable, areas containing private dwellings, industrial buildings, and

places of public assembly.” Section 195.210(b) further provides that “[n]o pipeline may be located within 50 feet (15 meters) of any private dwelling, or any industrial building or place of public assembly in which persons work, congregate, or assemble, unless it is provided with at least 12 inches (305 millimeters) of cover in addition to that prescribed in §195.248.”

Williams policy and practice is to place pipelines as far away as practical from the areas identified in § 195.210(a). In locations where buildings are near the pipeline (and outside of PHMSA’s 50 foot requirement), Williams exceeds the depth-of-cover requirements in §§ 195.210(b) and 195.248 by providing the pipeline with a minimum depth of cover of 60 inches. To ensure that our written procedures reflect the company’s longstanding practice and policy, Williams will update DG-4851 Section 8.4.8 to include language and requirements to clarify consistency with §195.210. Williams will also provide additional references to ensure the completion of checklist “New Construction Hazardous Liquid Checklist CZ-9019”.

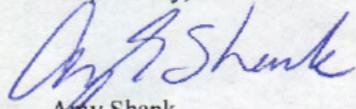
3. §195.202 Compliance with specifications or standards

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

PHMSA alleges that Williams did not have a clear and consistent standard for ensuring compliance with the depth-of-cover requirements in 49 C.F.R. § 195.248 in “Onshore Carbon Steel Pipeline Installation, ES-4852”. Williams procedure specifies that at locations considered “Water Crossings, including Marshes” the depth of cover shall be a minimum of 42 inches. The procedure also specifies that at locations considered “Water Crossings” the depth of cover shall be a minimum of 60 inches. The intent of these provisions is to specify that marshlands adjacent to water crossings may have 42 inches depth of cover, but that water crossings will have 60 inches of cover. While the provisions in “Onshore Carbon Steel Pipeline Installation, ES-4852” are consistent with the requirements in § 195.248, Williams understands the need for further clarity to reflect the company’s longstanding policy and practice. Accordingly, Williams will update the language to clearly state that the 42 inches depth of cover is allowed only where marshlands are adjacent to water crossings, and that all river crossings must meet or exceed 48-inch requirement in PHMSA’s regulations.

Williams looks forward to working with PHMSA in the future. Please feel free to contact me if you have any questions or concerns about the information provided in this letter.

Respectfully,



Amy Shank
Director, Asset Integrity & Pipeline Safety
Williams Field Services
Amy.Shank@williams.com

cc: Mark Cluff, Vice President – Safety & Operational Discipline