

May 3, 2018

Mr. Alan S. Armstrong  
President and Chief Executive Officer  
The Williams Companies, Inc.  
One Williams Center  
Tulsa, Oklahoma 74172

**Re: CPF No. 1-2017-1017**

Dear Mr. Armstrong:

Enclosed please find the Final Order issued in the above-referenced case. It makes one finding of violation and specifies actions that need to be taken by Transcontinental Gas Pipe Line Company, LLC, a subsidiary of Williams Partners, LP, to comply with the pipeline safety regulations. When the terms of the compliance order have been completed, as determined by the Director, Eastern Region, this enforcement action will be closed. Service of the Final Order by certified mail is effective upon the date of mailing as provided under 49 C.F.R. § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

Enclosure

cc: Mr. Robert Burrough, Director, Eastern Region, Office of Pipeline Safety, PHMSA  
Mr. Larry Legendre, Manager Pipeline Safety, Williams Atlantic Gulf, 2800 Post Oak  
Boulevard, Houston, Texas 77056

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**U.S. DEPARTMENT OF TRANSPORTATION  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION  
OFFICE OF PIPELINE SAFETY  
WASHINGTON, D.C. 20590**

In the Matter of	)	
	)	
Transcontinental Gas Pipe Line Company, LLC,	)	CPF No. 1-2017-1017
a subsidiary of Williams Partners, LP,	)	
	)	
Respondent.	)	
	)	

**FINAL ORDER**

On several dates between July 11 and October 14, 2016, pursuant to 49 U.S.C. § 60117, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), conducted on-site pipeline safety inspections of the facilities and records of Transcontinental Gas Pipe Line Company, LLC (Transco or Respondent), in Virginia, Pennsylvania, and New Jersey. Transco, a subsidiary of Williams Partners, LP (Williams), operates approximately 10,200 miles of gas pipelines in the United States.<sup>1</sup>

As a result of the inspection, the Director, Eastern Region, OPS (Director), issued to Respondent, by letter dated November 24, 2017, a Notice of Probable Violation and Proposed Compliance Order (Notice). In accordance with 49 C.F.R. § 190.207, the Notice proposed finding that Transco had violated 49 C.F.R. § 192.731 and proposed ordering Respondent to take certain measures to correct the alleged violation.

Williams, on behalf of Transco, responded to the Notice by letter dated December 21, 2017 (Response). The company did not contest the allegation of violation, but provided information concerning the corrective actions it had taken and requested additional time to comply with the proposed corrective actions. Respondent did not request a hearing and therefore has waived its right to one.

**FINDING OF VIOLATION**

In its Response, Transco did not contest the allegation in the Notice that it violated 49 C.F.R. Part 192, as follows:

**Item 1:** The Notice alleged that Respondent violated 49 C.F.R. § 192.731(a), which states:

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<sup>1</sup> Transco website, available at <http://co.williams.com/gulfcoast/transco/> (last accessed Jan. 16, 2018).

**§ 192.731 Compressor stations: Inspection and testing of relief devices.**

(a) Except for rupture discs, each pressure relieving device in a compressor station must be inspected and tested in accordance with §§ 192.739 and 192.743, and must be operated periodically to determine that it opens at the correct set pressure.

The Notice alleged that Respondent violated 49 C.F.R. § 192.731(a) by failing to inspect and test each pressure relieving device in a compressor station in accordance with § 192.743.

Specifically, the Notice alleged that Transco failed to determine if nine relief devices located in compressor stations were adequate from the standpoint of capacity, by failing to consider the magnitude of built up back pressure in the capacity calculations required under § 192.743.

During the inspection, the PHMSA inspector requested records for capacity calculations of certain relief devices at compressor stations for 2013 through 2015. The PHMSA inspector reviewed capacity calculations for nine relief valves located at Stations 165, 200, 505, and 515. The records indicated that Transco failed to consider built-up back pressure in the capacity calculations on nine relief valves located at compressor stations.

Respondent did not contest this allegation of violation. Accordingly, based upon a review of all of the evidence, I find that Respondent violated 49 C.F.R. § 192.731(a) by failing to inspect and test each pressure relieving device in a compressor station in accordance with § 192.743.

This finding of violation will be considered a prior offense in any subsequent enforcement action taken against Respondent.

**COMPLIANCE ORDER**

The Notice proposed a compliance order with respect to Item 1 in the Notice for violation of 49 C.F.R. § 192.731(a). Under 49 U.S.C. § 60118(a), each person who engages in the transportation of gas or who owns or operates a pipeline facility is required to comply with the applicable safety standards established under chapter 601. In its Response, Respondent requested additional time to comply with the terms of the proposed compliance order. The Director has recommended incorporating such additional time into this Order. Accordingly, pursuant to the authority of 49 U.S.C. § 60118(b) and 49 C.F.R. § 190.217, Respondent is ordered to take the following actions to ensure compliance with the pipeline safety regulations applicable to its operations:

1. With respect to the violation of § 192.731(a) (**Item 1**), Respondent must complete relief-valve capacity calculations for all DOT relief devices in compressor stations within the “Williams North” inspection system (South Carolina to New York), with vent piping and the magnitude of built-up back pressure considered. This shall be accomplished within 180 days of receipt of the Final Order.
2. Transco must provide PHMSA a spreadsheet or report summarizing the data from

the calculations performed in Item 1, and including identification of any relief devices that are determined to have inadequate capacity. This shall be accomplished within 180 days of receipt of the Final Order.

3. Transco must remediate or replace any devices that were determined to be inadequate by the calculations in Item 1 above, within 365 days of receipt of the Final Order.

4. All documentation demonstrating compliance with the compliance action items above must be submitted to the Director, Eastern Region, PHMSA, 820 Bear Tavern Road, Suite 103, West Trenton, New Jersey 08628, for review within the time frames stated for each item.

The Director may grant an extension of time to comply with any of the required items upon a written request timely submitted by the Respondent and demonstrating good cause for an extension.

It is requested (not mandated) that Respondent maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to the Director. It is requested that these costs be reported in two categories: (1) total cost associated with preparation/revision of plans, procedures, studies and analyses; and (2) total cost associated with replacements, additions and other changes to pipeline infrastructure.

Failure to comply with this Order may result in the administrative assessment of civil penalties not to exceed \$200,000, as adjusted for inflation (49 C.F.R. § 190.223), for each violation for each day the violation continues or in referral to the Attorney General for appropriate relief in a district court of the United States.

The terms and conditions of this Final Order are effective upon service in accordance with 49 C.F.R. § 190.5.

May 3, 2018

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Alan K. Mayberry  
Associate Administrator  
for Pipeline Safety

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Date Issued