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November 29th, 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 No. CPF 1-2017-5030M

Mr. Burrough:

On October 30, 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 March 6 and 10, 2016, in Moundsville, West Virginia.

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. Pursuant to the Notice, Williams is requesting an extension of 90 days for providing the final revised procedures to PHMSA. Williams has a strict management of change process for the comprehensive gathering of input and approvals for new procedures and modification of existing procedures, this timeline exceeds the 30 day window requested by PHMSA. Provided here today are the amendments Williams intends to make during this time frame.

1. §195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

PHMSA alleges that Williams does not have adequate procedures defining emergency response training of its supervisors and associated documentation. In Procedure SIP-ADM-12.01 Emergency Response and Planning section 3.2.3 Williams defines that the term "employee" includes Supervisors. Throughout section 3.2 Williams defines annual and other training requirements as well as the documentation of these steps on form F04-003.

Williams feels these steps are adequate to satisfy 49 CFR 195.402, however Williams is willing to add additional clarifying language to these steps, roles and requirements.

2. §195.402 Procedural manual for operations, maintenance, and emergencies.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations.

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part.

PHMSA alleges that Williams did not have adequate instructions in its written procedure, 9.01-ADM-018 Tests and Inspections of Overpressure Protection and Pressure Limiting Devices, and WES-57 – Regulator, Overpressure Protection Device and Control Valve Inspection. Williams feels sections 2.4.5 and 2.5.6 are adequate guidance and direction for defining “Controlled Pressure Found”, as well Section 2.2.3 and 3.2.3 are adequate for defining reset pressure requirements. Section 2.1.3 – 2.1.4 discuss in great detail the requirements for “Set Pressure” and “Capacity Mcf/hr at Set Point” is discussed 2.1.6 – 2.1.7 and is a generally accepted rate terminology within the oil and gas industry.

Williams believes these steps are adequate to satisfy section 49 CFR 195.402, however Williams is willing to add language for clarification and direct documentation of these steps on the form.

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/with this letter.

Respectfully,



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cc: Amy Shank, director – Pipeline Safety & Asset Integrity
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