U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628
609.771.7800

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

October 30, 2017

Mr. Mark Cluff
VP Safety & Operational Discipline
Williams Field Services
One Williams Center
Tulsa, OK 74172

CPF 1-2017-5031W

Dear Mr. Cluff:

From March 6 – 10, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Williams Field Services' (Williams) pipeline facility located in Moundsville, West Virginia.

As a result of the inspection, it is alleged that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violation(s) are:

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.

Williams failed to conduct an annual review of its emergency response plans and procedures at intervals not exceeding 15 months, but at least once each calendar year to insure that the manual

is effective. Specifically, Williams failed to conduct an annual review of its emergency response plans for the 2014 - 2016 calendar years.

During the inspection, the PHMSA inspector requested annual review records for the 2014 - 2016 calendar years. Williams stated they have no specific documentation related to an annual review other than the change log on its procedure, *Emergency Response and Planning, SIP-ADM-12.01*, Effective 11/17/16. Williams was unable to provide any data or response as to why the annual review was not conducted.

Therefore, Williams failed to conduct an annual review of its emergency response plans and procedures during the 2014, 2015 and 2016 calendar years.

2. **§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.

Williams failed to follow its manual of written procedures for conducting normal operations and maintenance activities. Specifically, Williams failed to follow its Pipeline Integrity procedure for examining and documenting exposed pipe conditions in accordance with § 195.589(c).

During the inspection, the PHMSA inspector reviewed Williams' *Examining and Documenting the Condition of an Underground Pipeline or Related Facility When Exposed – Pipeline Integrity*, dated 4/10/13 (Procedure) and 02-OPR-1581 – Maintenance Reports (Records).

The Procedure stated, "Each time a buried Pipeline or related underground Facility is exposed for any reason (intentionally or unintentionally), it must be thoroughly inspected (end-to-end) and the conditions documented on the appropriate form(s)." Additionally, the Procedure requires that the 02-OPR-1581 – Maintenance Report must be filled out.

In 4 instances the Records indicated incomplete data on the following sections:

- Leak Data
- Property Damage
- Shallow/Exposed Pipe
- Non-Destructive Testing and Pressure Test Data
- Pipe Installed
- Pipe Retired
- Fabricated Bends
- Pipe Detail
- Approval and Signatures

The PHMSA inspector asked Williams where the applicable information is documented and Williams was not able to provide a response.

Therefore, Williams failed to follow its Pipeline Integrity Procedure regarding completion of documentation of exposed pipeline conditions.

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed $209,002 per violation per day the violation persists up to a maximum of $2,090,022 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in Williams being subject to additional enforcement action.

Please 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).

No reply to this letter is required. If you choose to reply, please submit all correspondence in this matter to Robert Burrough, Acting Director, PHMSA Eastern Region, 820 Bear Tavern Road, Suite 103, West Trenton, NJ 08628. Please refer to **CPF 1- 2017-5031W** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on a CD accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

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