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Williams Field Services  
One Williams Center  
43-4  
Tulsa, OK 74172  
(405) 626-1785

December 8th, 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 1-2017-5032

Mr. Burrough:

On November 9, 2017, the Pipeline Safety and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Probable Violation and Proposed Civil Penalty (Notice) to Williams Field Services Company, LLC (Williams). The Notice identified certain alleged inadequacies in the records that Williams uses for documenting Abnormal Operating Conditions on 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.

**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 is fully committed to maintaining the safety of its pipeline facilities and takes any indication of potential non-compliance seriously. Williams recognizes that the PHMSA is committed to achieving that same goal and appreciates the fact that you are bringing your concerns to our attention. Williams will take corrective actions to ensure all fields on required documentation are completed and areas requiring signatures are collected. These are crucial steps in documenting our compliance.

Please accept this letter as notice that Williams Field Services has remitted the civil penalty assessed by PHMSA in the NOPV CPF 1-2017-5032 in the amount of \$22,400. For your reference, the wire transfer number is 476793 and was completed on Friday, December 8<sup>th</sup>, 2017.

Respectfully,

Clint Ratke  
manager – Pipeline Safety  
Williams Field Services  
clint.ratke@williams.com

cc: Amy Shank, director – Pipeline Safety & Asset Integrity, Williams Field Services  
Mark Cluff, vice president – Safety & Operational Discipline  
Paul Hunter, vice president – Northeast OA  
Stephen Furbacher, sr manager – Operations, Northeast OA  
Larry Hartley, supervisor – Operations, Northeast OA