

April 12, 2019

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

Re: CPF No. 1-2018-1002

Dear Mr. Armstrong:

Enclosed please find the Final Order issued in the above-referenced case to your subsidiary, Transcontinental Gas Pipe Line Company, LLC (Transco). It withdraws one of the allegations of violation, makes other findings of violation, assesses a civil penalty of \$344,700, and specifies actions that need to be taken by Transco to comply with the pipeline safety regulations. The penalty payment terms are set forth in the Final Order. When the civil penalty has been paid and the terms of the compliance order 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. Mark Cluff, Vice President Safety & Operational Discipline, Transcontinental Gas
Pipe Line Company, LLC, One Williams Center, Tulsa, OK 74172
Mr. Larry Legendre, Manager, Pipeline Safety & Compliance, Transcontinental Gas Pipe
Line Company, LLC, 2800 Post Oak Boulevard, Houston, TX 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. 1-2018-1002
a subsidiary of Williams Partners, LP,)	
)	
Respondent.)	
_____)	

FINAL ORDER

From May 23, 2016, through October 28, 2016, pursuant to 49 U.S.C. § 60117, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), and inspectors from the New York State Department of Public Service (NYS DPS), acting as agents of PHMSA, conducted an integrated, on-site pipeline safety inspection of the facilities and records of Transcontinental Gas Pipe Line Company, LLC (Transco or Respondent), at the company’s Princeton and Charlottesville Divisions, located in Pennsylvania, New York, New Jersey, Maryland, Delaware, Virginia, North Carolina and South Carolina. Transco, a subsidiary of Williams Partners, LP (Williams), operates a 10,200-mile interstate gas transmission pipeline system that extends from South Texas to New York City.¹

As a result of the inspection, the Director, Eastern Region, OPS (Director), issued to Respondent, by letter dated January 18, 2018, a Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order (Notice). In accordance with 49 C.F.R. § 190.207, the Notice proposed finding that Transco had committed 10 violations of 49 C.F.R. Part 192 and proposed assessing a civil penalty of \$395,400 for the alleged violations. The Notice also proposed ordering Respondent to take certain measures to correct the alleged violations.

Williams, on behalf of Transco, responded to the Notice by letter dated February 16, 2017² (Response). The company contested one allegation of violation in the Notice, as well as the proposed civil penalty and terms in the Proposed Compliance Order associated with that item. Respondent did not request a hearing and therefore has waived its right to one.

FINDINGS OF VIOLATION

The Notice alleged that Respondent violated 49 C.F.R. Part 192, as follows:

¹ See <http://co.williams.com/operations-2/atlantic-gulf-operating-area/transco/> (last accessed Nov. 8, 2018).

² It is presumed Respondent intended to date the letter February 16, 2018.

Item 1: The Notice alleged that Respondent violated 49 C.F.R. § 192.481(a), which states:

§ 192.481 Atmospheric corrosion control: Monitoring.

(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

If the pipeline is located:	Then the frequency of inspection is:
Onshore.....	At least once every 3 calendar years, but with intervals not exceeding 39 months
Offshore.....	At least once each calendar year, but with intervals not exceeding 15 months

The Notice alleged that Respondent violated 49 C.F.R. § 192.481(a) by failing to inspect each onshore pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, at a frequency of at least once every three calendar years, but with intervals not exceeding 39 months. Specifically, the Notice alleged that Transco inspected the onshore, above-ground facilities at its Compressor Station 185 for atmospheric corrosion, at an interval of 40.5 months between 2011 and 2014, exceeding the minimum requirement of § 192.481(a). Transco also inspected 27 valves at its onshore Compressor Station 185 at an interval of approximately 40.5 months, exceeding the minimum requirement of § 192.481(a).

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. § 192.481(a) by failing to inspect each onshore pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, at a frequency of at least once every three calendar years, but with intervals not exceeding 39 months.

Item 2: The Notice alleged that Respondent violated 49 C.F.R. § 192.603(b), which states:

§ 192.603 General provisions.

(a)

(b) Each operator shall keep records necessary to administer the procedures established under § 192.605.

The Notice alleged that Respondent violated 49 C.F.R. § 192.603(b) by failing to keep records necessary to administer the procedures established under § 192.605. Specifically, the Notice alleged that Transco failed to keep records of change-of-class-location studies required by § 192.609, “Change in class location: Required study.” The Notice included four pipeline segments for which Transco could not produce records of change-in-class-location studies commensurate with the maximum allowable operating pressure (MAOP) set for each of the four segments, as required by § 192.609. In each of the four segments, Transco allegedly was operating at a hoop stress that was one class above what the class-location-study records could verify was appropriate.

In its Response, Respondent contested this violation and requested an opportunity to provide new information related to the alleged violation. On March 27, 2018, Transco presented records to the Director that were located by the company after the completion of the inspection. The newly-submitted records showed hydrostatic tests had been performed on each of the four segments highlighted in the Notice, which proved that the MAOP for each segment was commensurate with its corresponding class location, in accordance with § 192.611. I find the segments at issue were in compliance § 192.603(b) at the time of inspection because Transco did in fact keep records necessary to administer the procedures established under § 192.605.

Accordingly, after considering all of the evidence, I find Respondent was not out of compliance with § 192.603(b) at the time of the inspection. Based upon the foregoing, I hereby order that Item 2 be withdrawn.

Item 3: The Notice alleged that Respondent violated 49 C.F.R. § 192.605(a), which states:

§ 192.605 Procedural manual for operations, maintenance, and emergencies.

(a) *General.* Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

The Notice alleged that Respondent violated 49 C.F.R. § 192.605(a) by failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. Specifically, the Notice alleged that Transco failed to follow its own written procedure, *20.13.01, Atmospheric and Offshore Splash Zone Corrosion Inspections*, dated December 31, 2012 (*Corrosion Procedure*). The Notice alleged that Transco's *Corrosion Procedure* required site-specific plans for corrosion inspections, but that such plans did not exist for 26 separate locations.

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. § 192.605(a) by failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.

Item 4: The Notice alleged that Respondent violated 49 C.F.R. § 192.605(a), as quoted above, by failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. Specifically, the Notice alleged that Transco failed to follow Section 2.9 of its own written procedure, *20.07.01, Annual Cathodic Protection Surveys*, dated January 30, 2013 (*Cathodic Protection Procedure*). The Notice alleged that Transco failed to gather and record open circuit potentials at all electrical isolation devices during annual cathodic-protection surveys during 2014 and/or 2015, as

specifically required by Transco's *Cathodic Protection Procedure*.

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. § 192.605(a) by failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.

Item 5: The Notice alleged that Respondent violated 49 C.F.R. § 192.605(a), as quoted above, by failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. Specifically, the Notice alleged that Transco failed to follow Section 2.8 of its own written *Cathodic Protection Procedure*. The Notice alleged that Transco failed to gather and record pipe-to-soil potential readings for the foreign structure at each foreign pipeline crossing where interference had been identified or suspected, as specifically required by Transco's *Cathodic Protection Procedure*.

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. § 192.605(a) by failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.

Item 6: The Notice alleged that Respondent violated 49 C.F.R. § 192.605(a), as quoted above, by failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. Specifically, the Notice alleged that Transco failed to follow its own written procedure, *70.11.01, Performing Transmission Line Leak Surveys*, dated December 21, 2012 (*Leak Survey Procedure*). The Notice alleged Transco failed to document leak-survey results, indications of investigations and corrective actions taken, as specifically required by the *Leak Survey Procedure*.

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. § 192.605(a) by failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.

Item 7: The Notice alleged that Respondent violated 49 C.F.R. § 192.709(b), which states:

§ 192.709 Transmission lines: Record keeping.

Each operator shall maintain the following records for transmission lines for the periods specified:

(a)

(b) The date, location, and description of each repair made to parts of the pipeline system other than pipe must be retained for at least 5 years. However, repairs generated by patrols, surveys, inspections, or tests required by subparts L and M of this part must be retained in accordance with paragraph (c) of this section.

The Notice alleged that Respondent violated 49 C.F.R. § 192.709(b) by failing to maintain records for transmission lines of the date, location, and description of each repair made to parts

of the pipeline system other than pipe for at least five years. Specifically, the Notice alleged that Transco failed to maintain a record of the date and description of a repair made to a leak discovered on a valve during Transco's 2013 annual leak survey. During the inspection, Transco indicated that a leak had been discovered on its V-89 tap valve during the 2013 annual leak survey and that it had been repaired. However, Transco could not produce any record of the repair having been made.

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. § 192.709(b) by failing to maintain records for transmission lines of the date, location, and description of each repair made to parts of the pipeline system other than pipe for at least five years.

Item 8: The Notice alleged that Respondent violated 49 C.F.R. § 192.745(a), which states:

§ 192.745 Valve maintenance: Transmission lines.

(a) Each transmission line valve that might be required during any emergency must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year.

The Notice alleged that Respondent violated 49 C.F.R. § 192.745(a) by failing to inspect and partially operate each transmission line valve that might be required during any emergency, at intervals not exceeding 15 months but at least once each calendar year. Specifically, the Notice alleged that on 14 separate occasions, Transco failed to operate emergency valves located in Transco's Pennsylvania-Southeast District, East District, and South District at intervals not exceeding 15 months.

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. § 192.745(a) by failing to inspect and partially operate each transmission line valve that might be required during any emergency, at intervals not exceeding 15 months but at least once each calendar year.

Item 9: The Notice alleged that Respondent violated 49 C.F.R. § 192.933(b), which states:

§ 192.933 What actions must be taken to address integrity issues?

(a) *General requirements.* An operator must take prompt action to address all anomalous conditions the operator discovers through the integrity assessment. In addressing all conditions, an operator must evaluate all anomalous conditions and remediate those that could reduce a pipeline's integrity....

(b) *Discovery of condition.* Discovery of a condition occurs when an operator has adequate information about a condition to determine that the condition presents a potential threat to the integrity of the pipeline. A condition that presents a potential threat includes, but is not limited to, those conditions that require remediation or monitoring listed under paragraphs (d)(1) through (d)(3) of this section. An operator must promptly, but no later than 180 days after conducting an integrity assessment, obtain sufficient information about a condition to make that determination, unless the

operator demonstrates that the 180-day period is impracticable.

(c) *Schedule for evaluation and remediation.* An operator must complete remediation of a condition according to a schedule prioritizing the conditions for evaluation and remediation....

The Notice alleged that Respondent violated 49 C.F.R. § 192.933(b) by failing to promptly, but no later than 180 days after conducting an integrity assessment, obtain sufficient information about an anomalous condition to make a determination that the condition presents a potential threat to the integrity of the pipeline. Specifically, the Notice alleged that Transco's date of discovery for scheduled conditions was more than 180 days following integrity assessments conducted on its Mainline A line in 2013 and its Mainline B line in 2014. The Notice also alleged that Transco failed to demonstrate that the 180-day period was impracticable for either assessment. 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. § 192.933(b) by failing to promptly, but no later than 180 days after conducting an integrity assessment, obtain sufficient information about a condition to make a determination that the condition presents a potential threat to the integrity of the pipeline.

Item 10: The Notice alleged that Respondent violated 49 C.F.R. § 192.947(d), which states:

§ 192.947 What records must an operator keep?

An operator must maintain, for the useful life of the pipeline, records that demonstrate compliance with the requirements of this subpart. At minimum, an operator must maintain the following records for review during an inspection.

(a)

(d) Documents to support any decision, analysis and process developed and used to implement and evaluate each element of the baseline assessment plan and integrity management program. Documents include those developed and used in support of any identification, calculation, amendment, modification, justification, deviation and determination made, and any action taken to implement and evaluate any of the program elements; . . .

The Notice alleged that Respondent violated 49 C.F.R. § 192.947(d) by failing to maintain, for the useful life of the pipeline, documents to support any decision, analysis and process developed and used to implement and evaluate each element of the baseline assessment plan and integrity management program. Specifically, the Notice alleged that Transco failed to maintain records to support its decisions, analyses and processes regarding the implementation of its integrity management program for preventative and mitigative (P&M) measures. According to the Notice, Transco maintains P&M measure records in its "Integrity Dashboard" database. The Notice alleged several discrepancies and deficiencies were found in the database during the inspection. For example:

- P&M measures were documented in the database for some high consequence areas (HCAs) but not for others;

- Certain P&M measures listed in the database were no longer being implemented by Transco in specific HCAs;
- Certain P&M measures shown in the Integrity Dashboard could not be matched to Transco's master list of currently available P&M measures;
- The Integrity Dashboard lacked sufficient details to demonstrate when P&M measures had been identified, what was their schedule for implementation, or when implementation was completed; and
- Transco's Management of Change records from 2013 through 2015 failed to contain any mention of changes made to P&M measures during that time period.

Respondent did not contest these allegations of violation. Accordingly, based upon a review of all of the evidence, I find that Respondent violated 49 C.F.R. § 192.947(d) by failing to maintain, for the useful life of the pipeline, documents to support any decision, analysis and process developed and used to implement and evaluate each element of the baseline assessment plan and integrity management program.

These findings of violation will be considered prior offenses in any subsequent enforcement action taken against Respondent.

ASSESSMENT OF PENALTY

Under 49 U.S.C. § 60122, Respondent is subject to an administrative civil penalty not to exceed \$200,000 per violation for each day of the violation, up to a maximum of \$2,000,000 for any related series of violations.³ In determining the amount of a civil penalty under 49 U.S.C. § 60122 and 49 C.F.R. § 190.225, I must consider the following criteria: the nature, circumstances, and gravity of the violation, including adverse impact on the environment; the degree of Respondent's culpability; the history of Respondent's prior offenses; any effect that the penalty may have on its ability to continue doing business; and the good faith of Respondent in attempting to comply with the pipeline safety regulations. In addition, I may consider the economic benefit gained from the violation without any reduction because of subsequent damages, and such other matters as justice may require. The Notice proposed a total civil penalty of \$395,400 for the alleged violations discussed above.

Item 1: The Notice proposed a civil penalty of \$37,700 for Respondent's violation of 49 C.F.R. § 192.481(a), for failing to inspect each onshore pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at a frequency of at least once every three calendar years, but with intervals not exceeding 39 months. Transco neither contested the allegation nor presented any evidence or argument justifying a reduction in the proposed penalty.

³ These amounts are adjusted annually for inflation. *See, e.g.*, Pipeline Safety: Inflation Adjustment of Maximum Civil Penalties, 82 Fed. Reg. 19325 (April 27, 2017).

Accordingly, having reviewed the record and considered the assessment criteria, I assess Respondent a civil penalty of \$37,700 for violation of 49 C.F.R. § 192.481(a).

Item 2: The Notice proposed a civil penalty of \$50,700 for Respondent's violation of 49 C.F.R. § 192.603(b), for failing to keep records necessary to administer the procedures established under § 192.605. For the reasons stated above, this allegation of violation has been withdrawn; therefore, the proposed civil penalty is also withdrawn.

Item 3: The Notice proposed a civil penalty of \$53,100 for Respondent's violation of 49 C.F.R. § 192.605(a), for failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. Transco neither contested the allegation nor presented any evidence or argument justifying a reduction in the proposed penalty. Accordingly, having reviewed the record and considered the assessment criteria, I assess Respondent a civil penalty of \$53,100 for violation of 49 C.F.R. § 192.605(a).

Item 4: The Notice proposed a civil penalty of \$35,700 for Respondent's violation of 49 C.F.R. § 192.605(a), for failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. Transco neither contested the allegation nor presented any evidence or argument justifying a reduction in the proposed penalty. Accordingly, having reviewed the record and considered the assessment criteria, I assess Respondent a civil penalty of \$35,700 for violation of 49 C.F.R. § 192.605(a).

Item 5: The Notice proposed a civil penalty of \$47,500 for Respondent's violation of 49 C.F.R. § 192.605(a), for failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. Transco neither contested the allegation nor presented any evidence or argument justifying a reduction in the proposed penalty. Accordingly, having reviewed the record and considered the assessment criteria, I assess Respondent a civil penalty of \$47,500 for violation of 49 C.F.R. § 192.605(a).

Item 6: The Notice proposed a civil penalty of \$27,600 for Respondent's violation of 49 C.F.R. § 192.605(a), for failing to prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. Transco neither contested the allegation nor presented any evidence or argument justifying a reduction in the proposed penalty. Accordingly, having reviewed the record and considered the assessment criteria, I assess Respondent a civil penalty of \$27,600 for violation of 49 C.F.R. § 192.605(a).

Item 7: The Notice proposed a civil penalty of \$27,300 for Respondent's violation of 49 C.F.R. § 192.709(b), for failing to maintain records for transmission lines of the date, location, and description of each repair made to parts of the pipeline system other than pipe, for at least five years. Transco neither contested the allegation nor presented any evidence or argument justifying a reduction in the proposed penalty. Accordingly, having reviewed the record and considered the assessment criteria, I assess Respondent a civil penalty of \$27,300 for violation of 49 C.F.R. § 192.709(b).

Item 8: The Notice proposed a civil penalty of \$64,400 for Respondent's violation of 49 C.F.R. § 192.745(a), for failing to inspect and partially operate each transmission line valve that might be required during any emergency, at intervals not exceeding 15 months but at least once each

calendar year. Transco neither contested the allegation nor presented any evidence or argument justifying a reduction in the proposed penalty. Accordingly, having reviewed the record and considered the assessment criteria, I assess Respondent a civil penalty of \$64,400 for violation of 49 C.F.R. § 192.745(a).

Item 9: The Notice proposed a civil penalty of \$51,400 for Respondent's violation of 49 C.F.R. § 192.933(b), for failing to promptly, but no later than 180 days after conducting an integrity assessment, obtain sufficient information about an anomalous condition to make a determination that the condition presents a potential threat to the integrity of the pipeline. Transco neither contested the allegation nor presented any evidence or argument justifying a reduction in the proposed penalty. Accordingly, having reviewed the record and considered the assessment criteria, I assess Respondent a civil penalty of \$51,400 for violation of 49 C.F.R. § 192.933(b).

In summary, having reviewed the record and considered the assessment criteria for each of the Items cited above, I assess Respondent a total civil penalty of **\$344,700**.

Payment of the civil penalty must be made within 20 days of service. Federal regulations (49 C.F.R. § 89.21(b)(3)) require such payment to be made by wire transfer through the Federal Reserve Communications System (Fedwire), to the account of the U.S. Treasury. Detailed instructions are contained in the enclosure. Questions concerning wire transfers should be directed to: Financial Operations Division (AMK-325), Federal Aviation Administration, Mike Monroney Aeronautical Center, 6500 S MacArthur Blvd, Oklahoma City, Oklahoma 79169. The Financial Operations Division telephone number is (405) 954-8845.

Failure to pay the \$344,700 civil penalty will result in accrual of interest at the current annual rate in accordance with 31 U.S.C. § 3717, 31 C.F.R. § 901.9 and 49 C.F.R. § 89.23. Pursuant to those same authorities, a late penalty charge of six percent (6%) per annum will be charged if payment is not made within 110 days of service. Furthermore, failure to pay the civil penalty may result in referral of the matter to the Attorney General for appropriate action in a district court of the United States.

COMPLIANCE ORDER

The Notice proposed a compliance order with respect to Items 2, 3, 9, and 10 in the Notice for violations of 49 C.F.R. §§ 192.603(b), 192.605(a), 192.933(b) and 192.947(d), respectively. 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.

With regard to the alleged violation of § 192.603(b) (Item 2), for the reasons stated above, this allegation of violation is withdrawn. Therefore, the terms of the proposed compliance order associated with this Item are not included.

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 § 192.605(a) (**Item 3**), Respondent must evaluate the entire Williams North inspection system for areas of “special consideration” as defined in Transco’s procedure, *20.13.01, Atmospheric and Offshore Splash Zone Corrosion Inspections, Rev. 1*, dated December 21, 2012, and develop site-specific atmospheric corrosion evaluation plans for all identified locations. Respondent must submit documentation demonstrating compliance with this item to the Director within 60 days of the issuance of this Final Order.

2. With respect to the violation of § 192.933(b) (**Item 9**), Respondent must review and update its procedures regarding discovery of conditions, including the procedure *70.17.01, Pigging – Inline Inspection*. Respondent must submit documentation demonstrating compliance with this item to the Director within 60 days of the issuance of this Final Order. The updates to the procedures must include, but not be limited to, the following:
 - a. Defining “impracticable” with regard to § 192.933(b) and the 180-day period for discovery of conditions;
 - b. Requiring discovery of conditions to occur within 180 days on all assessments, unless demonstrated to be impracticable for an integrity assessment via specified documentation; and
 - c. Documentation requirements for demonstrating impracticability of the 180-day period for an assessment.

3. With respect to the violation of § 192.947(d) (**Item 10**):
 - a. Within 60 days of the issuance of this Final Order, Respondent must review and update its current procedures regarding its P&M measures process. This update must include, but not be limited to, the following:
 - i. Defining the method for documenting P&M measures, including frequency for updating the system of record, and what specific information will be captured. This may include information such as date of initiation, completion, termination or other changes to the P&M measures; and
 - ii. Defining the roles and responsibilities regarding making these updates to the system of record.
 - b. Within 90 days of the issuance of this Final Order, Transco must review and update the data in its Integrity Dashboard or other updated system of record for the current P&M measures in place in HCAs, to comply with the updated procedures required above.
 - c. Respondent must submit documentation demonstrating compliance with this item to the Director within the timeframes specified above.

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 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.

Under 49 C.F.R. § 190.243, Respondent may submit a Petition for Reconsideration of this Final Order to the Associate Administrator, Office of Pipeline Safety, PHMSA, 1200 New Jersey Avenue, SE, East Building, 2nd Floor, Washington, DC 20590, with a copy sent to the Office of Chief Counsel, PHMSA, at the same address, no later than 20 days after receipt of service of this Final Order by Respondent. Any petition submitted must contain a statement of the issue(s) and meet all other requirements of 49 C.F.R. § 190.243. The filing of a petition automatically stays the payment of any civil penalty assessed. The other terms of the order, including corrective action, remain in effect unless the Associate Administrator, upon request, grants a stay.

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

April 12, 2019

Alan K. Mayberry
Associate Administrator
for Pipeline Safety

Date Issued