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Houston, TX 77056

Via: Email and FedEx Delivery

February 16, 2017

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

Re: CPF 1-2018-1002 – Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order

Dear Mr. Burrough,

On January 19, 2018, Transcontinental Gas Pipeline Company, LLC (Transco), received the above-referenced Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order in the subject docket. In accordance with §190.208 and “Response Options for Pipeline Operators in Enforcement Proceedings” enclosed with these documents, Transco provides the following responses:

Response to Notice of Probable Violation

Transco elects not to contest the items listed in the NOPV with the exception of the following:

Transco elects to contest Item 2 by submitting the following written response as permitted by §190.208(a)(3) and Response Option I.a.3.:

Item 2 alleges that “Transco failed to keep records necessary to administer the procedures established under § 192.605. Specifically, in four instances Transco failed to keep records of change of class location studies conducted in accordance with § 192.609.”.

During the 2016 inspection, the PHMSA inspection team identified that Transco was operating four pipeline segments one class above the indicated design for hoop stress. It was explained that Transco historically interpreted 192.611 to allow for this operation. The inspection team did not request Transco provide records to show compliance with 192.609 during the inspection. The inspection team requested the dates for which the Class location of each of the four pipeline segments changed from the original

Class location. Transco was not able to provide those dates during the inspection. The four pipeline segments have been in continuous service since before 1970 and the original Class location records were not readily available.

Subsequent to the inspection, Transco identified documents that demonstrate the original Class location for each of the four pipeline segments determined according to 1970 era § 192.607. Transco can also show how it has historically achieved compliance with § 192.609.

Transco respectfully requests an opportunity to informally discuss this response with the Director of the Eastern Region and his inspection staff. Our intent is to gain a better understanding of PHMSA's expectations related to compliance with §192.609 and allow an opportunity for Transco to provide information related to its interpretation and procedural workflows pertaining to this code provision.

Response to Proposed Compliance Order

Transco elects not to contest the items listed in the PCO with the exception of the following:

Transco elects to contest Items 1 and 2 by submitting the following written response as permitted by §190.208(b)(3) and Response Option I.b.3.:

During the 2016 inspection, the PHMSA inspection team identified that Transco was operating four pipeline segments one class above the indicated design for hoop stress. It was explained that Transco historically interpreted 192.611 to allow for this operation. The inspection team did not request Transco provide records to show compliance with 192.609 during the inspection. The inspection team requested the dates for which the Class location of each of the four pipeline segments changed from the original Class location. Transco was not able to provide those dates during the inspection. The four pipeline segments have been in continuous service since before 1970 and the original Class location records were not readily available.

Transco respectfully requests an opportunity to informally discuss this response along with the response to NOPV Item 2 with the Director of the Eastern Region and his inspection staff.

Transco is strongly committed to the safe operations of all pipeline systems. Please contact me, Larry Legendre at 713-215-2733 if you would like to discuss or if you need any additional information. Thank you for your consideration regarding these matters.

Sincerely,

Larry Legendre
Manager Pipeline Safety
Transcontinental Gas Pipe Line Company, LLC

Perrine, Nora CTR (PHMSA)

From: Burrough, Robert (PHMSA)
Sent: Friday, February 16, 2018 5:49 PM
To: Perrine, Nora CTR (PHMSA)
Cc: Breen, Anthony (PHMSA); Springer, Michael (PHMSA)
Subject: FW: CFP 1-2010-1002 - Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order
Attachments: Williams Transcontinental Gas Pipeline Response to NOPV CPF 1-2018-1002.pdf

FYI

Thanks,

Rob Burrough
Director, Eastern Region

From: Legendre, Larry D <Larry.D.Legendre@Williams.com>
Sent: Friday, February 16, 2018 3:49:03 PM
To: Burrough, Robert (PHMSA)
Subject: CFP 1-2010-1002 - Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order

Dear Mr. Burrough,

On January 19, 2018, Transcontinental Gas Pipeline Company, LLC (Transco), received the above-referenced Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order in the subject docket. In accordance with §190.208 and "Response Options for Pipeline Operators in Enforcement Proceedings" please find attached Transco's response to the subject docket. The original signed response has been mailed via overnight courier.

Williams is strongly committed to the safe operations of all pipeline systems. Please contact me, Larry Legendre at 713-215-2733 if you would like to discuss or if you need any additional information. Thank you for your consideration regarding these matters.



Larry Legendre | Williams | Manager | Pipeline Safety & Compliance
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