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A handwritten signature in blue ink, appearing to be "M.R.", located to the right of the Williams logo.

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Transcontinental Gas Pipeline Company
2800 Post Oak Blvd
Houston, TX 77056
(405) 626-1785

December 14, 2018

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: CPF 1-2018-1005

Mr. Burrough;

On November 16th, 2018, the Pipeline Safety and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Probable Violation (NOPV), Proposed Civil Penalty, and Proposed Compliance Order (PCO) to Williams – Transcontinental Gas Pipe Line Company (Transco), for alleged violations of Pipeline Safety Regulations that were identified during the incident inspection of Station 535 in Austin, Potter County, Pennsylvania that occurred between December 13-15th, 2016.

Williams is fully committed to maintaining the safety of its operations. Williams has reviewed the alleged violations and has already begun addressing the findings identified in the Notice of Probable Violation and Proposed Compliance Order, as detailed in the responses below.

1. § 192.475 Internal corrosion control: General.

(a) Corrosive gas may not be transported by pipeline, unless the corrosive effect of the gas on the pipeline has been investigated and steps have been taken to minimize internal corrosion.

PHMSA alleges that Transco violated § 192.475 by transporting corrosive gas without investigating the possibility of corrosive effect on the gas on Station 535 and taking steps to minimize internal corrosion. Specifically, Transco failed to investigate the corrosive effects of the natural gas withdrawn from the Wharton Storage Field on its Station 535 and failed to take steps to minimize internal corrosion.

Proposed Compliance Order (1.a): Transco must investigate the corrosive effects of gas on all compressor stations and piping associated with storage field operations within 90 days of receipt of the Final Order.

Following the incident at Station 535, Transco investigated the corrosive effects on all compressor stations and piping associated with storage fields. Specifically, Stations 54, 77, and 535, Williams's compressor stations with storage field operations, were assessed. These actions are expected to satisfy 1.a once the Final Compliance Order is received.

Proposed Compliance Order (1.b): Based on the results of the investigations in 1(a), Transco must determine what steps, if any, are necessary to minimize internal corrosion on the pipelines between the compressor station and the storage caverns or storage field piping, within 120 days of receipt of

the Final Order. These steps could include, but are not limited to, developing site specific internal corrosion programs for minimizing and monitoring of internal corrosion.

Transco initiated a Corrosion Containment Plan initiative to address at-risk assets and included Stations 54, 77 and 535 in the program. Transco has developed a Site-Specific Internal Corrosion Monitoring Plan for Station 535. The requirements of the plan were reviewed with Operations on November 27th, 2018. Outstanding actions will be entered into GenSuite for tracking to closure. These actions are expected to satisfy 1.b once the Final Compliance Order is received.

Proposed Compliance Order (1.c): Transco must implement the steps determined to be necessary in 1(b) within 180 days of receipt of the Final Order

Transco is implementing the actions resulting from the activities completed for 1.b. above as part of the activities planned for Calendar Year 2019. All actions determined necessary to complete prior to Station 535 startup will be completed prior to the planned in-service date in the 1Q19. Based on the extent and duration of the activities, all activities may not complete until later years per plan. Any additional activities that result from the Corrosion Containment Plan initiative will follow completion of those Projects. These actions are expected to satisfy 1.c once the Final Compliance Order is received.

2. §192.609 Procedural manual for operations, maintenance, and emergencies: General.

(a) 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 one 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.

PHMSA alleges that Transco violated §192.609(a) by failing to follow its own manual of written procedures for conducting normal operations and maintenance activities. Specifically, Transco failed to follow its procedures for taking appropriate steps within one year of the date of the 2015 incident to minimize internal corrosion when internal corrosion is found in its pipeline system, in accordance to §192.475(b)(3).

Proposed Compliance Order: None

Williams will reiterate the requirement to follow our operations and maintenance procedures for 49CFR192 regulated facilities with field personnel.

Williams looks forward to working with PHMSA to correct the assertions in this letter. Please feel free to contact me at 405-626-1785 if you have any questions or concerns about the provided solutions to the PHMSA concerns in this letter.

Respectfully,



Clint Ratke
Manager – Pipeline Safety
Williams
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cc: Al Taylor, Vice President Operations – Eastern Interstates
Mark Cluff, Vice President – Safety & Operational Discipline
Eric Raymond, Director Operations – Princeton Division

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