

RECEIVED JUN - 8 2018



A handwritten signature in blue ink, appearing to be "NR".

*We make energy happen.*

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

June 7, 2018

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

**Re: CPF 1-2018-1007**

Mr. Burrough;

On April 2<sup>nd</sup>, 2018, the Pipeline Safety and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Probable Violation (NOPV) and Proposed Civil Penalty (PCP) to Williams - Transcontinental Gas Pipeline Company (Transco), for an alleged violation of Pipeline Safety Regulations that was identified during the inspection of the Virginia Southside Lateral construction project in South Boston, Virginia that occurred between February 9<sup>th</sup> and 13<sup>th</sup>, 2015.

Williams is fully committed to maintaining the safety of its construction projects. Williams was in receipt of the Notice of Probable Violation on April 3<sup>rd</sup>, 2018 and apologizes for not responding to the Eastern Region in a timely manner. Williams has reviewed the alleged violation and has already addressed the findings identified in the Notice and as detailed in the response below. Please be advised that Williams will be remitting payment for the Civil Penalty assessed in the Notice.

1. **§ 192.243 Nondestructive testing.**
  - (b) **Nondestructive testing of welds must be performed:**

**(1) In accordance with written procedures; and...**

PHMSA alleges that Williams failed nondestructively test welds in accordance with Williams written procedures. Specifically, Williams failed to follow *Procedure 90.09.01 – Nondestructive Testing of Welds, Rev. 11, 12/31/2012*.

Williams has corrected the alleged inadequacy by reinforcing to our personnel the requirements detailed in Procedure 90.09.01, in addition Williams has organized a Standards Assurance team that proactively audits our various operations compliance with our own procedures.

Williams appreciates that an open communication with PHMSA is beneficial to both parties and looks forward to working with PHMSA in the future. 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  
Transcontinental Gas Pipeline Company  
Clint.Ratke@Williams.com

cc: Al Taylor, Vice President Operations – Eastern Interstates  
John Poarch, Sr Vice President – Engineering Services  
Evan Kirchen, Vice President Project Execution - AG  
D.R. Bud Rains, Director Projects AG  
Mark Hartman, Manager Construction – AG Onshore Construction Projects  
Mark Cluff, Vice President – Safety & Operational Discipline  
Amy Shank, Director – Pipeline Safety & Asset Integrity