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

March 9th, 2018

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

RE: CPF No. CPF 1-2018-5007

Mr. Burrough:

On January 18, 2018, 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). On February 8, 2018, PHMSA provided Williams with a copy of the Pipeline Safety Violation Report and the Proposed Civil Penalty Worksheet for the Notice. PHMSA also granted Williams a 30-day extension of the original deadline for submitting a response. The Notice identified certain alleged inadequacies in the reporting timeframe to the National Response Center (NRC), as well as inadequate procedures for the commissioning of the Oak Grove to Houston Ethane Pipeline (Pipeline). PHMSA identified the alleged inadequacies during an inspection that occurred on January 20, 2015, in Moundsville, West Virginia. Williams response to each Probable Violation alleged in the Notice is set forth below. Please be advised that Williams has submitted payment for the Civil Penalties assessed in the Notice.

**1. §195.52 Immediate Notice of Certain Events**

**(a) Notice requirements. At the earliest practicable moment following discovery, of a release of the hazardous liquid or carbon dioxide transported resulting in an event described in §195.50, but no later than one hour after confirmed discovery, the operator of the system must give notice, in accordance with paragraph (b) of this section of any failure that:**

**(2) Resulted in either a fire or explosion not intentionally set by the operator;**

Following this isolated failure to make timely notification, Williams conducted a thorough review of the circumstances surrounding the failure to provide timely notice of the event. While an isolated incident, Williams provided subsequent training to prevent repeat incidents.

In addition, Williams replaced the procedure referenced (6.04-ADM-002) in the Notice with procedure 11.05.00.01 - Incident Notification and Reporting. This new procedure provides a more robust process for ensuring compliance with PHMSA's reporting requirements. It requires employees to call various events in to an internal group, called the "Security Operations Center". In addition to other functions, the Security Operations Center is on call 24 hours a day to provide 24-hour incident reporting. The group will fill a key role in Williams ability to fully comply with all

applicable regulations, and ensure it makes timely and proper required notifications of incidents. . Employees were trained on this procedure prior to its implementation, and a courtesy copy is attached for review.

**2. §195.202 Compliance with Standards or Specifications**

**Each pipeline system must be constructed in accordance with comprehensive written specifications or standards that are consistent with the requirements of this part.**

Williams's standards are written to ensure compliance with all applicable regulations and to achieve standardization within the company. As a result of the incident investigation and root cause analysis, Williams created a new Pre-Startup Safety Review (PSSR) and provided additional training on PSSR procedures. The root cause analysis identified areas in which the existing PSSR was deficient. An enterprise-wide lessons learned was presented to ensure similar errors do not happen at other locations within the enterprise. The new PSSR and lessons learned placed emphasis on correct engineering and operational expertise of a project, including design reviews, PHAs, construction, and PSSR's during commissioning.

In addition, Williams replaced the procedure 9.09-ADM-001 referenced in the Notice with procedure 09.00.00.02 - Pre-Startup Safety Review. The new procedure provides additional requirements for ensuring facilities are built to robust company standards, and a courtesy copy is attached for review. Company-wide training was provided with the implementation of this procedure to ensure employees at all levels use it to ensure safety and compliance.

Williams shares PHMSA's commitment to pipeline safety and believes that the steps described above will address the concerns identified in the Notice. Please feel free to contact me at (918) 573-2506 if you have any additional questions or concerns about this matter.

Please accept this letter as notice that Williams Field Services has remitted the civil penalty assessed by PHMSA in NOPV CPF 1-2018-5007 in the amount of \$174,100.

Respectfully,



Amy Shank  
Director – Pipeline Safety & Asset Integrity  
Williams Field Services  
[Amy.Shank@williams.com](mailto:Amy.Shank@williams.com)

Enclosures (2) : 11.05.00.01 – Incident Notification and Reporting  
09.00.00.92 – Pre-Startup Safety Review

cc: Mark Cluff, vice president – Safety & Operational Discipline  
Paul Hunter, vice president – Northeast OA  
Kathy Campbell, director – Field EH&S Northeast OA  
Stephen Furbacher, manager – Ohio River Supply Hub