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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 1-2018-5008

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). The Notice relates to an over-pressurization event that occurred on the Houston M&R facility at approximately 6:24 p.m. on February 11, 2015 (the Incident). The Notice identifies certain alleged inadequacies in Williams' procedures and records related to post-incident drug and alcohol testing, as well as alleged failures to follow certain procedures in the operations and maintenance (O&M) manual for the Oak Grove to Houston Ethane Pipeline (Pipeline). PHMSA identified the alleged inadequacies during an inspection that occurred on February 17, 2015, in Moundsville, West Virginia. For the reasons set forth more specifically below, Williams respectfully requests an informal hearing with respect to the alleged violation of §199.105 for failing to complete required drug testing.

1. §199.105 Drug tests required.

(b) Post-accident testing. (1) As soon as possible but no later than 32 hours after an accident, an operator must drug test each surviving covered employee whose performance of a covered function either contributed to the accident or cannot be completely discounted as a contributing factor to the accident. An operator may decide not to test under this paragraph but such a decision must be based on specific information that the covered employee's performance had no role in the cause(s) or severity of the accident.

Williams contests the allegations that it failed to administer a post-incident drug test to the senior pipeline controller within the required 32-hour timeframe. The Incident occurred at approximately 6:24 p.m. on February 11, 2015. The pipeline controller received a DOT drug test by LabCorp in Tulsa, Oklahoma, on February 12, 2015 at 2:06 p.m., with the results being negative for drug use. The drug test occurred within 20 hours of the Incident, well before the 32-hour deadline provided in the cited regulation. The timing and results of this DOT-drug test were indicated during the inspection on Form 00222 referenced in the Notice and were also indicated in follow-up email correspondence between Williams and PHMSA dated April 14, 2016. As a courtesy, these documents are attached again for PHMSA's review.

Williams respectfully requests that PHMSA withdraw this alleged violation and proposed civil penalty from the Notice. If PHMSA takes that action, Williams will withdraw its hearing

request and remit payment for the civil penalties assessed for the remaining violations. If PHMSA does not withdraw this item, Williams intends to contest the allegation of violation and proposed civil penalty at an informal hearing.

2. §199.225 Alcohol tests required

(a) Post-accident. (1) As soon as practicable following an accident, each operator must test each surviving covered employee for alcohol if that employee's performance of a covered function either contributed to the accident or cannot be completely discounted as a contributing factor to the accident. The decision not to administer a test under this section must be based on specific information that the covered employee's performance had no role in the cause(s) or severity of the accident.

Williams acknowledges that alcohol testing was not performed on the senior pipeline controller within 8 hours of the incident. To ensure timely compliance in the future, Williams implemented additional employee training regarding PHMSA alcohol testing requirements.

3. §195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

(c) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(1)....

(3) Operating, maintaining, and repairing the pipeline system in accordance with each of the requirements of this subpart and subpart H of this part

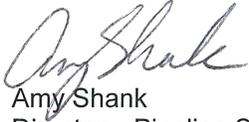
Williams acknowledges that that the applicable O&M procedures were not followed. To ensure future compliance with §195.402, Williams provided additional employee training regarding Lockout Tagout procedures. This training included lessons learned that placed an emphasis on following company procedures to ensure safety and compliance.

In addition, Williams replaced the procedure 5.50-ADM-025 that was in effect at the time of the Incident with procedure 02.10.70.26 - Midstream Lockout Tagout (Control of Hazardous Energy Sources). A companywide training was required of all employees following the implementation of the improved procedure. This new procedure will ensure the safety of Williams's operations when performing work on our assets.

Finally, a physical lockout switch was installed at the Houston Meter site for local control only. This will provide an additional level of safety for all future work being performed at this site.

Williams hopes that PHMSA decides to withdraw the allegation of violation in Item 1 based on the additional information provided in this response, thereby avoiding the need to hold an informal hearing. With regard to the remaining violations, 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 if you have any additional questions or concerns about this matter.

Respectfully,



Amy Shank
Director – Pipeline Safety & Asset Integrity
Williams Field Services
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Enclosures (5): Form 00222
Email Communications
02.10.70.26 - Midstream Lockout Tagout (Control of Hazardous Energy Sources)
Employee Drug Test CCF
Controlled Substance Test Report

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