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Transcontinental Gas Pipeline Company  
2800 Post Oak Blvd  
Houston, TX 77056

February 3, 2020

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

**Re: CPF No 1-2019-1011W**

Mr. Burrough,

On July 23, 2019 - Transcontinental Gas Pipeline Company, LLC (Williams) received a Warning Letter as a result of inspections by PHMSA on Transco's Garden State Expansion Project in Princeton, New Jersey. The inspections were conducted from May 16-17, 2017, June 26-27, 2017, and May 9-10, 2018. As a result of the inspection, it is alleged that Transco committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR).

The probable violation is:

*The Defect Legend and Grading Scale annotations templated in the WilsOP Weld Inspection Film Reports required Grading Scale annotations as follows: 1 (small/minor), 2 (moderate/borderline) or 3 (excessive/reject).*

*However, the records reviewed were marked with a check mark for welding defects and not a 1, 2 or 3, as was required. Therefore, Transco failed to document its nondestructive testing in accordance with its WilsOP Weld Inspection Film Report instructions, developed to comply with § 192.243(f).*

After review of this specific occurrence and auditing the effectiveness of this procedure, Williams has determined that the grading criteria created more risk of non-conformance with our company procedures than the value it added. Since it is not required by regulation, the decision has been made to remove these criteria from our procedure. The revisions are underway and will be implemented this year.

If there are any questions with respect to Williams' completion of the items in the Warning Letter or if any additional documentation is needed, please contact me by phone or email.

Respectfully,

A handwritten signature in black ink, appearing to read "Tyson Green". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tyson Green  
Manager Pipeline Safety  
Tyson.Green@Williams.com  
713-215-2535

cc: Glen Jasek, VP/GM Eastern Interstates  
Mark Cluff, VP Safety & Operational Discipline  
Amy Shank, Director, Asset Integrity  
Eric Raymond, Director Operations, Princeton Division  
James Urisko, PHMSA Director, Southern Region