

**NOTICE OF PROBABLE VIOLATION
and
PROPOSED CIVIL PENALTY**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 27, 2018

Mr. Mark Cluff
Vice President, Safety & Operational Discipline
Williams Partners, L.P.
Pine Needle Company, LLC
One Williams Center
MD 43-1
Tulsa, Oklahoma 74172

CPF 2-2018-3001

Dear Mr. Cluff:

From June 27-30, 2017, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected the Pine Needle Liquefied Natural Gas (Pine Needle) facility in Stokesdale, North Carolina. Pine Needle is a subsidiary of Williams Partners, L.P.

As a result of the inspection, it is alleged that Pine Needle has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The item inspected and the probable violation is as follows:

- 1. § 191.29 National Pipeline Mapping System.**
 - a) Each operator of a gas transmission pipeline or liquefied natural gas facility must provide the following geospatial data to PHMSA for that pipeline or facility:**
 - 1) Geospatial data, attributes, metadata and transmittal letter appropriate for use in the National Pipeline Mapping System. Acceptable formats and additional information are specified in the NPMS Operator Standards Manual available at**

www.npms.phmsa.dot.gov or by contacting the PHMSA Geographic Information Systems Manager at (202) 366-4595.

2) The name of and address for the operator.

3) The name and contact information of a pipeline company employee, to be displayed on a public Web site, who will serve as a contact for questions from the general public about the operator's NPMS data.

b) The information required in paragraph (a) of this section must be submitted each year, on or before March 15, representing assets as of December 31 of the previous year. If no changes have occurred since the previous year's submission, the operator must comply with the guidance provided in the NPMS Operator Standards manual available at www.npms.phmsa.dot.gov or contact the PHMSA Geographic Information Systems Manager at (202) 366-4595.

Pine Needle failed to submit each year, on or before March 15, information required by §191.29(a) representing its assets as of December 31 of the previous year. Specifically, Pine Needle failed to submit geospatial data, attributes, metadata and transmittal letter appropriate for use in the National Pipeline Mapping System NPMS in a timely manner for calendar years 2014, 2015, 2016 and 2017.

Following PHMSA's inspection, the inspector contacted PHMSA's Geographic Information Systems (GIS) Manager to verify Pine Needle's NPMS data submittals. According to PHMSA's records, Pine Needle submitted its NPMS data for calendar years 2014, 2015, 2016 and 2017 as follows:

Calendar Year	Submittal Date	Duration of Exceedance, days
2014	March 27, 2014	11
2015	March 17, 2015	1
2016	March 24, 2016	8
2017	May 9, 2017	54

Proposed Civil Penalty

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$209,002 per violation per day the violation persists, up to a maximum of \$2,090,022 for a related series of violations. For violations occurring prior to November 2, 2015, the maximum penalty may not exceed \$200,000 per violation per day, with a maximum penalty not to exceed \$2,000,000 for a related series of violations. Also, for LNG facilities, an additional penalty of not more than \$76,352 for each violation may be imposed. The Compliance Officer has reviewed the circumstances and supporting documentation involved in the above probable violation and has recommended that you be preliminarily assessed a civil penalty of \$25,000 for Item 1 above.

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. All material submit in response to this enforcement action may be made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, or request a hearing under 49 CFR § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order. If you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from the receipt of this Notice. This period may be extended by written request for good cause.

In your correspondence on this matter, please refer to **CPF 2-2018-3001** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

James A. Urisko
Director, Office of Pipeline Safety
PHMSA Southern Region

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*