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One Williams Center
P.O. Box 2400
Tulsa, OK 74102

March 2, 2020

Mr. James Urisko
Director, Office of Pipeline Safety
PHMSA, Southern Region
230 Peachtree Street N.W.
Suite 2100
Atlanta, GA 30303

Dear Mr. Urisko,

This submittal is in response to the Notice of Probable Violation (NOPV) issued to Gulfstream Management & Operating Services, L.L.C. (Williams) in docket **CPF 2-2020-1001** dated January 23, 2020. The Pipeline and Hazardous Materials Safety Administration (PHMSA) has requested a response to Item 4 by February 22, 2020. Williams submitted a request for extension dated February 21, which was followed by your subsequent email dated February 24 granting us until March 2 to accept or contest the findings.

Item 4 alleges that Williams failed to comply with §192.613 (Continuing Surveillance) by not initiating a program to recondition or phase out a segment of its pipeline at MLV 60-1 that was determined to need repair during an atmospheric corrosion survey conducted on March 30, 2017. The NOPV states that Williams personnel were unable to produce any evidence that the valve had ever been reconditioned or repaired in response to the survey results.

Williams conducted an internal investigation of the events that occurred following the March 30 survey and the failure of that piping on December 16, 2017. It was discovered that on October 26, 2017 Williams repainted the valve site and initiated a project to replace the subject piping showing corrosion. This work was scheduled to occur the first quarter of 2018 had the incident not occurred prior. While Williams did take action to recondition the piping prior to the next scheduled inspection, the response time from March to October highlights a deficiency in our work processes and we agree it should have been addressed sooner. As a result, we do not contest these allegations.

Regarding the warnings issued in Items 1 and 2, Williams has initiated an internal improvement initiative to streamline the handling of leak reporting and ensure *confirmed discovery* is reached as

expeditiously as possible following the report of a leak. This initiative will also address any gaps that exist in the handling of 48-hr follow up notifications to ensure they are submitted as required.

And finally, regarding the warning Item 3, the task performed during the PHMSA inspection is typically performed at Station 420 during a station outage. Because the station was online at the time of the inspection, the operators could not follow the procedure as written without causing an actual emergency shutdown. To provide needed clarity to the procedure when performing these tasks with the station online, Station 420 personnel have drafted a site-specific procedure to supplement the enterprise procedure. This site-specific procedure will be shared with other, similar facilities so they may determine applicability to their specific equipment.

Should you have any questions or concerns about this response or actions Williams has taken, please feel free to contact me at (713) 215-2535.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tyson Green', with a long horizontal flourish extending to the right.

Tyson Green
Manager Pipeline Safety
Transmission and Gulf of Mexico
Williams

CC: Mark Cluff, Vice President, Safety and Operational Discipline
Amy Shank, Director, Pipeline Integrity
Mark Cizek, Vice President/General Manager, Gulf of Mexico