



June 6, 2012

Mr. David Barrett
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106-2641

CPF 3-2012-5006M

Dear Mr. Barrett:

On October 24-28, 2011 a representative of the Central Region, Pipeline and Hazardous Materials Safety Administration (PHMSA) conducted an on-site pipeline safety inspection of Williams Field Services Company operating and maintenance procedures specifically related to the Overland Pass Pipeline (OPPL). This inspection resulted in a Notice of Amendment dated March 13, 2012.

The Notice of Amendment alleges that inadequacies were identified in the Williams Field Services Company operating and maintenance procedures as stated below:

1. §195.402 Procedural Manual for Operations, Maintenance and Emergencies.

§195.402(a) requires that 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.

§195.402(c) indicated that the manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:

(13) Periodically reviewing the work done by operator to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.



- *"The procedure for this requirement was inadequate because it lacked guidance for the supervisors, and Williams must provide more clarification to indicate what is performed to meet this requirement. The current procedure simply states that any observation will be submitted through SIP feedback. However, there is no guidance regarding how often operator work is reviewed, the procedures reviewed, or documentation requirements including corrective actions or no improvement is necessary based on the review of work".*

2. §195.402 (See Above)

(e) Emergencies. The manual required by paragraph (a) of this section must include procedures for the following to provide safety when an emergency condition occurs.

(8) In the case of failure of a pipeline transporting a highly volatile liquid, use of appropriate instruments to assess the extent and coverage of the vapor cloud and determine the hazardous areas.

- *"The procedure was inadequate because there was no guidance on the use of appropriate instruments to determine the extent and coverage of a vapor cloud should a release occur".*

3. §195.402 (See above)

§ 195.408 Communications.

(b) The communication system required by paragraph (a) of this section must, as a minimum, include means for:

- (2) Receiving notices from operator personnel, the public, and public authorities of abnormal or emergency conditions and sending this information to appropriate personnel or government agencies for corrective action;**
- (3) Conducting two-way vocal communication between a control center and the scene of abnormal operations and emergencies; and,**



(4) Providing communication with fire, police, and other public officials during emergency conditions, including a natural disaster.

- *"The procedure was inadequate because it did not provide guidance for receiving notices from the public and others about an emergency; the kind of two-way vocal communications required; and the communication with fire, police and appropriate public officials. If specific procedures are located in other parts of the SIP, then cross reference to those parts must be made in procedure.*

Williams Field Services Company will not challenge nor contest the Notice of Amendment and has modified the enclosed procedures:

Item 1

- SIP-ADM-9.01 – Operations and Maintenance, Section 3.3.7
- 9.01-ADM-039 Determining O & M Procedure
- Form 0082

Item 2

- 12.01-ADM-002 – Emergency Response Plan, Section 3.5.2.1

Item 3

- 12.01-ADM-002- Emergency Response Plan, Sections 2.1.2, 3.5.3 and 3.5.3.1

Should you have further questions or require additional information, please contact Joe Freisberg at (918) 573-0810.

Williams hereby formally reaffirms its desire to fully cooperate with the Central Region, Pipeline and Hazardous Materials Safety Administration in all matters of regulatory compliance. Ongoing, Williams is committed to safe and reliable operations, with protective regard to the public, the environment, and to its employees.

Sincerely,

A handwritten signature in black ink, appearing to read "Cherie Humphries", with a long horizontal flourish extending to the right.

Cherie Humphries
General Manager, NGL Services
Williams Field Services Company

Enclosures (3)