

**NOTICE OF PROBABLE VIOLATION  
PROPOSED CIVIL PENALTY  
AND  
PROPOSED COMPLIANCE ORDER**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 3, 2014

Mr. Alan Armstrong  
President, Chief Executive Officer  
Williams Energy LLC  
One Williams Center  
Tulsa, Oklahoma 74172

**CPF 4-2014-1002**

Dear Mr. Armstrong:

Representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code have been reviewing your reports and notifications that have been submitted to PHMSA. As a result of this review, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

**1. §191.22 National Registry of Pipeline and LNG Operators**

**(c) Changes. Each operator of a gas pipeline, gas pipeline facility, LNG plant, or LNG facility must notify PHMSA electronically through the National Registry of Pipeline and LNG Operators at <http://opsweb.phmsa.dot.gov>, of certain events.**

**(1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs:**

**(ii) Construction of 10 or more miles of a new pipeline**

Williams Field Services did not notify PHMSA of the construction of a new pipeline within the proper timeframe. On January 6, 2014 Williams Field Services submitted an Operator Registry Notification G-20140106-2328 for construction of 209 miles of 20" offshore gas gathering pipeline in the Gulf of Mexico. The information that was submitted states that "The Gas Export Pipeline component of the

Keathley Canyon Connector (KCC) system consists of an approximately 209 mile 20-inch OD pipeline originating at a Pipeline End Termination (PLET) in the vicinity of KC-831 and terminating at a newly built junction platform in the vicinity of South Timbalier Area (ST) Block 283.” According to the notification, anticipated start date of field construction activities was October 7, 2013; however, through conversation with company personnel, actual construction on October 15, 2013. The original notification was filed approximately 143 days after construction began and not 60 days prior to construction.

On February 13, 2014, Williams Energy LLC submitted Operator Registry Notification G-20140213-4263. In it Williams stated that the earlier notification G 20140106-2328 incorrectly stated that the pipeline was being constructed by Williams Field Services LLC. Williams Energy LLC, and not Williams Field Services, was the entity constructing the pipeline. All other information was unchanged from the earlier notification from Williams Field Services.

## **2. §191.22 National Registry of Pipeline and LNG Operators**

**(b) OPID Validation. An operator who has already been assigned one or more OPID by January 1, 2011, must validate the information associated with each OPID through the National Registry of Pipeline and LNG Operators <http://opsweb.phmsa.dot.gov> and correct that information as necessary, no later than June 30, 2012.**

Williams Energy LLC has inaccurately updated the information with the National Registry of Pipeline and LNG Operators. The operator Contact Information has one named individual, with the same phone number for: DOT Compliance, the Emergency Contact 24-7, and contact for Normal Operations 24-7, the Senior Executive, NPMS, and User Fee. The date of the most recent revision that PHMSA received was September 24, 2012.

### Proposed Civil Penalty

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. 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 \$15,800 for item 1.

Proposed Compliance Order

With respect to item 2, and pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Material Safety Administration proposes to issue a Compliance Order to Williams Energy LLC. Please refer to the Proposed Compliance Order, which is enclosed and made a part of this Notice.

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). 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.

In your correspondence on this matter, please refer to **CPF 4-2014-1002** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration

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

## **PROPOSED COMPLIANCE ORDER**

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Williams Energy LLC a Compliance Order incorporating the following remedial requirement to ensure the compliance of Williams Energy LLC with the pipeline safety regulations:

1. In regard to Item 2 of the Notice pertaining to the inaccurately updated information with the National Registry of Pipeline and LNG Operators. Williams Energy LLC is to update their Operator Contact information with the correct contacts for their: DOT Compliance, the Emergency Contact 24-7, Normal Operations Contact 24-7, the Executive, NPMS and User Fee.