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2800 Post Oak Boulevard
P. O. Box 1396
Houston, Texas 77251-1396

April 3, 2014

Mr. Rodrick Seeley
Director, Southwest Region
Pipeline and Hazardous Material Safety Administration
8701 S. Gessner Road, Suite 900
Houston, TX 77074

CPF: 4-2014-1002

Re: Response to Notice of Probable Violation (NOPV) – Keathley Canyon Connector Late Construction Notification

Dear Mr. Seeley,

On March 7, 2014, Williams received a Notice of Probable Violation (NOPV) of 49 CFR 191.22 (c). The NOPV states that Williams Field Services did not notify PHMSA of the construction of a new pipeline within the required 60-day notification time period. This project involves a 20-inch offshore pipeline of approximately 209 miles and is referred to as the Keathley Canyon Connector.

On June 4, 2013, Williams created the original PHMSA Notification Type G in the PHMSA Portal and indicated an anticipated construction start date of October 7, 2013. At that time, Williams assumed the notification was submitted in final as indicated in the attached internal email dated June 4, 2013.

On October 15, 2013, construction of this pipeline started, which was 133 days after the original notification was created and assumed to have been submitted.

On February 13, 2014, the notification was revised to correct the OPID of 30940- Williams Energy LLC. It is not evident why the current notification is dated January 6, 2014.

The screenshot from the PHMSA Portal below shows the original construction notification was created on June 6, 2013.

Welcome to the Pipeline Community

Subscribed to: 2013-2014 PHMSA Field Services

Welcome eric.husenbury Logout

Announcements
 Start: 5/15/2014 End: 4/15/2014
 Created Date: 4/15/2014
 Contact:
 All 2013 gas annual report forms (including Mechanical Fitting Failures) are available for use and are due on March 15, 2014. The 2013 Hazardous Liquid annual report is under going changes and will be available for filing on April 15, 2014.

Resources
 Applications of Interest
 ODES (Incidents/Annuals prior to 2010 and Operator Pipeline Online Reporting (Incidents after Jan 3, 2010)
 Operator Qualification
 PHMS
 Pipeline Data Mart
 Websites of Interest
 OPS Website
 Stakeholder Communications
 PHMSA Website

Notifications and Validations

Task #	Description	Status	Start Date	Due Date	Updated By	Last Updated Date	Document	Delete	Notes
1	OPERATOR VALIDATION	Submitted	5/20/2013	4/20/2013	Fraser, Joe (PHMSA)	5/24/2013			Validation Form re target list
2	NOTIFICATION TYPE G - CONSTRUCTION OF 10 OR MORE MILES OF A...	Saved	3/20/2014		Bodell, Clayton (PHMSA)	3/20/2014			
3	NOTIFICATION TYPE A - CHANGE IN THE NAME OF THE OPERATOR	Saved	2/13/2014		Buserburg, Eric (eric.buse...)	2/13/2014			
4	NOTIFICATION TYPE B - CHANGE IN THE ENTITY (e.g., COMPANY, DIVI...	Saved	2/13/2014		Buserburg, Eric (eric.buse...)	2/13/2014			
5	NOTIFICATION TYPE G - CONSTRUCTION OF 10 OR MORE MILES OF A...	Processed	6/6/2013		Buserburg, Eric (eric.buse...)	4/7/2014			
6	NOTIFICATION TYPE G - CONSTRUCTION OF 10 OR MORE MILES OF A...	Created	6/6/2013		Buserburg, Eric (eric.buse...)	1/2/2014			

Williams accepts responsibility for the missed notification. However, the screenshot from the PHMSA Portal, along with the internal email provides Williams intention to submit the notification within the required 60-day timeframe. For this reason, Williams contests the NOPV and respectfully requests that PHMSA considers reducing the violation from an NOPV to a Warning Letter. Williams has evaluated the process flow for creating, submitting, and storing these notifications and has added measures to assure that all future notifications complete the submittal process.

In addition, the NOPV contained a Compliance Order to address inaccurate contact information for the OPID 30940 Williams Field Services, LLC. Williams finished updating all contacts on March 17, 2014 in the PHMSA Portal and will comply with the other requirements set forth in the Compliance Order.

Sincerely,

Marie G. Sotak
 Manager Pipeline Safety, Gas and Liquids- East

Enclosure

Cc: Donald E. Hockaday III, Williams Senior Counsel
 Josiah R. Neave, Williams, Vice President, Safety and Regulatory Compliance
 Stephen D. Potts, Williams, Director, Pipeline and Process Safety