

## NOTICE OF AMENDMENT

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 24, 2017

Stephanie Timmermeyer  
Vice President Safety and Regulatory  
Williams Energy, LLC  
525 Central Park Drive  
Oklahoma City, OK 73105

**CPF 4-2017-2004M**

Dear Ms. Timmermeyer:

On multiple dates between the months of September 2015 and February 2016, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your procedures for Williams Energy Discovery – Offshore Gas pipeline system in Houston, Texas.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Williams Energy (Williams) plans or procedures, as described below:

**1. § 192.805 Qualification program.**

**Each operator shall have and follow a written qualification program. The program shall include provisions to:**

- (i) After December 16, 2004, notify the Administrator or a state agency participating under 49 U.S.C. Chapter 601 if the operator significantly modifies the program after the Administrator or state agency has verified that it complies with this section.**

The Williams' OQ Program (implemented on 7/6/2015), section 6: Communication Changes does

not direct the operator to send significant change notifications to a state agency. The OQ Program must be amended to address significant notification to Louisiana Department of Natural Resources (LADNR).

**2. § 192.605 Procedural manual for operations, maintenance, and emergencies**

**(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**

**(4) Gathering of data needed for reporting incidents under Part 191 of this chapter in a timely and effective manner.**

Williams System Integrity Plan, 6.04-ADM-002 – Release Reporting lacks procedures including the following information to notify National Response Center by telephone to 800-424-8802:

- (1) Names of operator and person making report and their telephone numbers.
- (2) The location of the incident.
- (3) The time of the incident.
- (4) The number of fatalities and personal injuries, if any.
- (5) All other significant facts that are known by the operator that are relevant to the cause of the incident or extent of the damages.

The Williams System Integrity Plan does not meet the requirements of §192.605(b)(4) and §191.5(b). The plan must be amended to ensure that regulatory requirements involving immediate notice of certain incidents are adhered to.

**3. § 192.615 Emergency plans.**

**(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:**

**(3) Prompt and effective response to a notice of each type of emergency, including the following:**

- (i) Gas detected inside or near a building.**
- (iv) Natural disaster.**

The Williams Discovery Producer Services 2015 Emergency Response Plan does not address procedures for making a prompt and effective response to a notice of emergency including gas detected inside or near a building and a natural disaster.

Williams must amend their procedure to ensure the process addresses the prompt and effective response to a notice of emergency including gas detected inside or near a building and a natural disaster.

**4. § 192.617 Investigation of failures.**

**Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.**

Williams has a process that includes procedures for analyzing accidents and failures, but it does not include the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence.

Williams must amend their procedures to address the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence.

**5. § 192.805 Qualification program.**

**Each operator shall have and follow a written qualification program. The program shall include provisions to:**

- (c) Allow individuals that are not qualified pursuant to this subpart to perform a covered task if directed and observed by an individual that is qualified;**

The Williams OQ Plan failed to establish span-of-control ratios via comparative analysis. As a result, the plan allows more un-qualified individuals to perform a covered task while being directed and observed by a qualified individual.

For example, while reviewing Williams OQ Plan (effective date: 7/6/2015), Appendix C - Covered Task List with Span of Control, the PHMSA inspector learned that covered tasks 603: Compressor Units/Stations: Start-up, Operation, Shutdown and Purging Before Returning to Service; 606: Locate and Marked Submerged Pipelines and 607: Damage Prevention: Observation for Excavating and Backfilling allows span of control 1:3. Further inquiry revealed that Williams adopted Veriforce guidelines of Span of Control. The span of control should be established through the use of a comparative analysis (one which assesses the relative difficulty, importance, and frequency of performance of the various tasks, commonly known as a "DIF" analysis).

The Williams OQ plan must be amended to establish span-of-control ratios for each task via comparative analysis.

**6. § 192.605 Procedural manual for operations, maintenance, and emergencies**

**(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**

- (2) Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.**

The Williams Corrosion Control Procedures fail to state that the corrosion control procedures

required by §192.605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods as required by §192.453.

The Williams Corrosion Control Procedures must be amended to meet the requirements of §192.453.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. 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. Be advised that all material you submit in response to this enforcement action is subject to being 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.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Williams Energy, LLC. maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Terri J. Binns, Acting Director, SW Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2017-2004M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Frank Causey  
Acting Director, SW Region  
Pipeline and Hazardous Materials Safety Administration

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