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**Larry Legendre**  
**Manager Pipeline Safety**  
**Williams Atlantic Gulf**

October 5, 2017

Mr. Frank Causey  
Director, Office of Pipeline Safety  
Pipeline and Hazardous Materials Safety Administration Southwest Division  
8701 S. Gessner Road, Suite 900  
Houston, TX 77074

**Re: CPF 4-2017-2004M - Notice of Amendment**

Dear Mr. Causey,

On September 12, 2017 Williams Energy LLC, aka Discovery Offshore Gas Pipelines, received a Notice of Amendment (NOA) from the Pipeline and Hazardous Materials Safety Administration (PHMSA). The NOA was dated August 24, 2017, however it was addressed to Stephanie Timmermeyer whom is no longer with Williams. We have strived to respond as quickly as possible due to this delay. Please see below for a detailed response to each item including excerpts from applicable Williams procedures.

Williams is strongly committed to the safe operations of all pipeline systems. Please contact me, Larry Legendre at 713-215-2733 if you would like to discuss or if you need any additional information. Thank you for your consideration regarding these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "L Legendre", written over a light blue horizontal line.

Larry Legendre

Enclosures:

WISOP 10.18.02 Collection and Preservation of Specimens, Samples, and Data for Pipeline Incidents and Failures

1. The NOA states that Williams OQ program implemented 7/6/2015 does not direct the operator to send significant change notification to LADNR.

- This item has been corrected in Section 6 of the current Williams OQ plan.
- The current revision was implemented 8/24/2017.
- Below is an excerpt from the plan.

6.1. Creation of New Covered Tasks or Modification to Existing Covered Tasks.

**Modification to Plan**

When modifications relating to the Plan occur, such as regulatory revisions, the Plan Administrator must consider whether additional Qualification requirements are necessary and whether Individuals performing the Covered Tasks should be evaluated. The Plan Administrator will communicate these changes to local Management, all affected Individuals, and Contract Administration. The notification will be made to Company Management after the modification is adopted by the Company. The notification will be made electronically, as well as by written or teleconference communication, as deemed appropriate by the Plan Administrator. Changes that alter the Program and are considered by the Plan Administrator to be Significant will be sent to the Department of Transportation, Office of Pipeline Safety, and to applicable State agencies.

U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration

East Building, 2nd Floor

1200 New Jersey Ave., SE

Washington, DC 20590

Arkansas Public Service Commission

1000 Center Street

Little Rock, AR 72203

Alabama Public Service Commission

P.O. Box 304260

Montgomery, AL 36130

Colorado Public Utility Commission

1560 Broadway, Suite 250

Denver, CO 80202

Louisiana Department of Natural Resources

P.O. Box 94396

Baton Rouge, LA 70804-9396

2. The NOA states Williams procedure “SIP 6.04-ADM-002 – Release Reporting” lacks instructions for the operator to include all required information per 192.605(b)(4) when notifying the NRC of an incident.

- SIP 6.04-ADM-002 was replaced by “WIMS 11.05.00.01 - Incident Notification and Reporting Procedure”.
- “Appendix C: Incident Data Collection Standard” located in the above WIMS procedure provides instructions to operator personnel to include all required information.
- This new procedure was implemented 9/20/2017.
- Below is an image of Appendix C.

Revision 04

Effective Date 09/20/2017



## Appendix C: Incident Data Collection Standard

- Name of the facility, or if not at a facility, latitude/longitude, or name of nearest facility
- If pipeline/facility is DOT regulated (State or Federal)
- Gensuite Field Office (all Williams facilities are assigned to a Field Office location in the Gensuite hierarchy)
- Time and date of detection
- Location, including State, county, section, township, range, milepost, and engineering station number
- Estimated volume of release and name/description of substance released
- Description of *incident*
- Any water body impacted by release
- Estimated cost of property damage and product loss
- Fire at or near a facility
- Any death, personal injuries, including number of hospitalizations, if applicable
- Description of emergency action taken
- Any service interruption to customers
- Any evacuation of personnel

**NOTE:** DOT reportable *incidents* require notification to the NRC and applicable State agencies within 1 hour of confirmed discovery. Timely reporting to the SOC to allow formal determination of confirmed discovery is critical. **If all of the information listed above is not available, DO NOT delay contacting SOC immediately.** Additional information can be provided via a follow up call with the SOC, the EHS Representative, or Pipeline Safety Representative.

**3. The NOA states that Williams Discovery emergency response plan does not address procedures for making a prompt and effective response to notice of emergency including gas detected inside or near a building and also during a natural disaster.**

- “SIP 12.01-ADM-002 Emergency Response Plan Template” defines both “Gas detected inside or near a building” and “Flooding, Blizzard, Hurricane, and Tornado” as emergency events. It then directs operator personnel to respond to these emergency events as appropriate. This procedure revision was implemented 3/24/2017.
- Below is an excerpt from SIP 12.01-ADM-002.

EMERGENCY RESPONSE PLAN	12.01-ADM-002- EMERGENCY RESPONSE PLAN TEMPLATE
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**1.0 GENERAL**

**1.1 Overview**

An Emergency Response is a response effort by Company employees or designated responders (fire departments, paramedics, police, etc.) to an Emergency Event.

An Emergency Event is an unexpected event, which, if not responded to immediately, has the potential to cause large-scale injury to humans and/or damage to the environment or property. An Emergency Event may include, but is not limited to:

- Uncontrolled Fire,
- Underground storage cavern subsidence or collapse,
- Gas detected inside or near a building,
- Extreme weather conditions (flooding, blizzard, hurricane, tornado),
- Explosions (accidental or intentional, as in a bombing),
- Pipeline or equipment (vessels, etc.) rupture or serious leak,
- Releases of hazardous chemicals (accidental or intentional),
- Similar significant events

The nature of an Emergency Event will dictate the level of response and

4. The NOA states that Williams procedures for analyzing accidents and failures does not include the selection of samples of the failed equipment for laboratory examination.

- WIMS 11.10.00.01 – Incident Investigation Process directs all Operator personnel to refer to WILSOP 10.18.02 – Collection and Preservation of Specimens, Samples, and Data for Pipeline or DOT Reportable Accidents and Failures. See link embedded in this procedure below.
- This new procedure was implemented 6/22/2017.
- The complete procedure 10.18.02 has been attached to this response.

Responsible Party	Action
	<ul style="list-style-type: none"> <li>• Collect and preserve data and information relating to process and control conditions</li> <li>• Examine physical evidence such as the condition of tools, equipment, material, and environmental conditions</li> <li>• Collect and document soil, water, and other samples representative of the environment</li> <li>• If pipeline or facility piping damage or failure is involved, document the general conditions of the exposed pipe and any undisturbed coating, as well as damaged pipe and coating; examine for visible corrosion, material defects or other visible abnormalities</li> <li>• Collect existing records of training, facility construction, vendor manuals, and equipment certifications, test reports, and maintenance history</li> <li>• Collect police reports</li> </ul> <p>Collect historical documentation for similar events, such as previous Incident Investigations, Concern Reports, Continuous Improvement Advisories, Lessons Learned documents, etc.</p> <p><b>NOTE:</b> <a href="#">F11-003 – Incident Root Cause Analysis</a> may be used as an additional tool to capture incident investigation summaries at the Investigation Team's discretion.</p> <p><b>NOTE:</b> Maintain strict control and custody of all evidence pertaining to the event. Physical evidence leaving the custody of the Company must be accompanied by <a href="#">F11-002 – Chain of Custody</a>.</p> <p><b>NOTE:</b> For Pipeline or Department of Transportation (DOT) Reportable events, refer to <a href="#">10.18.02 – Collection and Preservation of Specimens, Samples and Data for Pipeline or DOT Reportable Accidents and Failures</a>.</p> <p><b>ATTENTION:</b> In some cases, evidence should not be moved or disturbed without authorization from regulatory agencies.</p>

5. The NOA states that Williams OQ plan failed to establish span-of-control ratios via comparative analysis. PHMSA further states that, as a result the plan allows more un-qualified individuals to perform a covered task while being directed by a qualified individual.

- The current Williams OQ Plan states that Williams employees and management reserve the right to reduce the Span-of-Control (SOC) depending on task complexity or adverse or severe working environment conditions. To show compliance with PHMSA NOA item 5, Williams has already made changes to SOC for CT606 Locate and Mark Submerged Pipelines and CT607 Damage Prevention: Observation of Excavating and Backfilling since the Audit performed by PHMSA in 2015. CT603 Compressor Units/Stations: Start-up, Operation, Shutdown, and Purging Before Returning to Service SOC will be changed in the next OQ Plan revision. Expected implementation is 6- weeks.
- Williams, along with Veriforce and other industry operators are reviewing SOC for all other Covered Tasks as well as difficulty and frequency of performance.
- See excerpt from Appendix C below.

603	Compressor Units/Stations: Start-up, Operation, Shutdown, and Purging Before Returning to Service	192.605(b)(6) 192.605(b)(7) 192.751	N/A	Observation & Oral Exam	Yes	1:3	3
604	Locate, Mark, and Remediate Exposed Pipelines in the Gulf of Mexico	192.612(b)	195.413	Observation & Oral Exam	Yes	1:3	3

Common Covered Task List							
Task ID	Task Description	49 CFR 192	49 CFR 195	Evaluation Method	Perf by Non-Qualified Indiv. Allowed?	Span of Control Limit	Requal Interval (Years)
605	Locate Line/Install Temporary Marking of Buried Pipeline	192.614(c)(5)	195.442(c)(5)	Observation & Oral Exam	Yes	1:3	3
606	Locate and Mark Submerged Pipelines	192.614(c)(5)	N/A	Oral Examination	No	1:0	3
607	Damage Prevention: Observation of Excavating and Backfilling	192.328(a)(1) 192.614(c)(6)	195.252 195.442(c)(6)	Oral Examination	Yes	1:1	3

6. The NOA states that Williams corrosion control procedures fail to state that the corrosion control procedures required by 192.605(b)(2), including those for the design, operation, and maintenance of cathodic protection systems must be carried out by, or under direction of, a person qualified in pipeline corrosion control methods as required by 192.453.

- SIP-ADM-7.04 – External Corrosion Control will be revised as soon as possible.
- An excerpt from the revised procedure draft is below.

	<b>System Integrity Plan</b>	Element:	Initiative No:	
		Revision No:	Pipeline Integrity	SIP-ADM-7.04
Initiative:		9	Effective Date:	Page:
			01/01/11	1 of 5
<b>EXTERNAL CORROSION CONTROL</b>				

## 1.0 OBJECTIVE

1.1 To maintain the integrity of Company operated assets by following a consistent external corrosion control process.

## 2.0 DESCRIPTION

2.1 This Initiative outlines Standards to mitigate external corrosion. These include but are not limited to:

- System evaluations
- Coating selection and application
- Criteria for cathodic protection
- Cathodic protection system design, installation, operations and maintenance to mitigate corrosion

2.2 All of the Standards are developed through sound corrosion engineering concepts and are applied under the direction of competent personnel trained in the field of corrosion control. These Standards are governed by the Company procedures and applicable regulations, and are consistent with Industry Standards. Corrosion personnel (including, but not limited to: Senior Corrosion Specialist, Corrosion Technician, and Manager of Operations) shall be Operator Qualified, or under appropriate Span of Control direction of an Operator Qualified individual, in order to perform relevant corrosion control tasks on regulated assets. Corrosion related data will be considered in the overall Risk Management process to determine/modify the frequency of future inspections, surveys and other corrosion mitigation measures or new developing technologies.