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2800 Post Oak Blvd
Houston, TX 77056



Larry Legendre
Manager Pipeline Safety
Williams Atlantic Gulf

October 31, 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 4-2017-2005 – Notice of Probable Violation, Proposed Civil Penalty, and Proposed Compliance Order

Dear Mr. Causey,

On October 16, 2017 Williams Energy LLC, aka Discovery Offshore Gas Pipelines, received the subject Notice of Probable Violation (NOPV), Proposed Civil Penalty (PCP), and Proposed Compliance Order (PCO), from the Pipeline and Hazardous Materials Safety Administration (PHMSA). The NOPV is the result of PHMSA Southwest Region's inspection of Williams' Discovery offshore gas gathering pipelines beginning in 2015. This letter serves as Williams' formal response to the NOPV, PCP, and PCO.

In accordance with the "Response Options for Pipeline Operators in Enforcement Proceeding" enclosed with the NOPV, Williams provides the following Responses:

Notice of Proposed Violation

Williams has elected not to contest any of the violations alleged in the NOPV.

Response to the Proposed Civil Penalty

Williams will provide electronic payment in the amount of \$56,900.

Response to the Proposed Compliance Order

Williams has elected not to contest any of the items described in the PCO. Please see below for more information for each item listed in the PCO.

1. In regard to item 1 of the NOPV - Continuing Surveillance:
 - Williams has drafted a new WIMS procedure 07.16.01.15 "Continuing Surveillance" to comply with this notice. The procedure is currently in the review stage and is expected to be implemented on 11/16/2017. The current draft procedure has been attached to this letter.

2. In regard to item 2 of the NOPV – Periodic Review of Work Done by Operator Personnel to Determine the Effectiveness, and Adequacy of the Procedures Used in Normal Operation and Maintenance:
 - Williams has implemented WIMS procedure 12.02.00.07 "Periodic Normal Operations and Maintenance Procedure Reviews" in order to comply with this notice. This procedure was implemented on 3/10/2017. The full procedure has been attached to this letter.

3. In regard to item 4 of the NOPV – Clean and Coat Pipeline Segments at GI-115A
 - In June of 2016, Williams Discovery Operations investigated the reports of corrosion on the 8" and 20" pipe segments noted in the NOPV. The 8" segment was found to have no corrosion and was re-coated. The 20" segment had two corrosion cells that were cleaned and measured for RSTRENG analysis. No further action was warranted and the segment was re-coated and remains in service. The maintenance reports and RSTRENG analysis has been attached to this letter.

4. In regard to Item 4 of the PCO – Timelines for Completion
 - Williams has already completed many of the required tasks. The timelines provided in the PCO will be met or further communication will be provided to the Region Director.

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,


Larry Legendre