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2800 Post Oak Blvd.  
Houston, TX 77056

March 1, 2017

Mr. R. M. Seeley  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration  
8701 S. Gessner Road, Suite 1100  
Houston, TX 77074

**Re: Williams Olefins Feedstock Pipelines, LLC – Federal OPID No. 32614  
NOPV-PCP-PCO, CPF No. 4-2017-5001**

Dear Mr. Seeley,

On January 30, 2017, Williams Olefins Feedstock Pipelines, LLC (Williams) (Federal OPID No. 32614) 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”) dated January 25, 2017. The NOPV is the result of PHMSA’s inspection of Williams’ Bayou Ethane system and Iowa to Port Neches 6-inch pipeline system conducted 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 Proceedings” enclosed with the NOPV, Williams provides the following responses:

**Response to Notice of Proposed Violation**

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

**Response to Proposed Civil Penalty**

As a result of Williams’ decision to not contest the violations alleged in the NOPV, Williams will provide electronic payment of the PCP in the amount of \$253,900.

**Response to Proposed Compliance Order**

**2014 Annual Report.** PCO Item 1 requires Williams to submit an accurate 2014 annual report to PHMSA by submitting a supplemental annual report that includes the BASF Connection pipeline information. This will be completed within 30 days after receipt of the Final Order. Williams is currently reviewing annual report data and will submit the corrected data on a supplemental annual report and will notify PHMSA once the submission has been completed.

**Iowa Extension Atmospheric Corrosion.** PCO Item 2 requires correction of all deficiencies identified in Williams’ Iowa Extension atmospheric corrosion inspections within 365 days after receipt of the Final Order. Williams informs PHMSA that work has commenced to correct the

identified atmospheric corrosion deficiencies and Williams will begin providing a monthly update after receipt of the Final Order regarding the deficiencies that have been corrected.

**Documentation of Compliance Costs.** PCO Item 3 requests, but does not mandate, that Williams maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. PHMSA requests that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies, and analyses, and 2) total cost associated with replacements, additions, and other changes to pipeline infrastructure.

Thank you for your consideration of William's responses to the NOPV, PCP, and PCO. If you have any questions related to Williams' response, please contact me at 713-215-2733.

Sincerely,



Larry D. Legendre  
Manager, Pipeline Safety – Atlantic-Gulf

*Electronic Transmittal*

cc: R. Korbe, Williams Manager, Operations  
M. Cluff, Williams VP, Safety and Operational Discipline  
A. Shank, Williams Director, Pipeline Safety  
L. Hill, Williams Senior Counsel  
C. Bodell, Williams Engineer, Pipeline Safety