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Williams Field Services – Gulf Coast Company
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December 14, 2018

Mary McDaniel
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074

Re: CPF 4-2018-2001

Ms. McDaniel;

On November 16th, 2018, the Pipeline Safety and Hazardous Materials Safety Administration (PHMSA) issued a Notice of Probable Violation (NOPV), Proposed Civil Penalty, and Proposed Compliance Order (PCO) to Williams Field Services – Gulf Coast Company (Williams), for alleged violations of Pipeline Safety Regulations that were identified during the operations and maintenance inspection of Williams offshore Seahawk Gas Gathering System West Gulf Coast that occurred between January 24 through July 10th, 2017.

Williams is fully committed to maintaining the safety of its operations. Williams has reviewed the alleged violations and has already begun addressing the findings identified in the Notice of Probable Violation and Proposed Compliance Order, as detailed in the responses below. Williams elects not to contest the items listed in the NOPV with the exception of Item 2. Williams respectfully requests an opportunity to informally discuss this response with the Director of the Southwest Region and the inspection staff or have Item 2 removed from the Notice of Probable Violation.

1. § 192.613 Continuing Surveillance.

(a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.

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

(e) Surveillance, emergency response, and accident investigation. The procedures required by §192.613(a), §192.615, and §192.617 must be included in the manual required by paragraph (a) of this section.

PHMSA alleges that Williams violated § 192.613 by failing to have a procedure to address continuing surveillance of its pipeline facilities. At the time of the inspection Williams personnel informed PHMSA that we were in the active process of drafting such a procedure.

Proposed Compliance Order (1): Williams Field Services must include [written procedures addressing continuous surveillance of pipeline facilities] in their manual to fulfill 192.613 (a). This must be completed within 30 days of after receipt of the Final Order.

Following the Seahawk Gas Gathering System inspection, Williams drafted and implemented a new procedure that addresses the PHMSA concerns in regards to the Continuous Surveillance. That procedure (07.16.01.15 - Continuing Surveillance) is attached.

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

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

PHMSA alleges that Williams violated §192.605 by failing to have a procedure to address the steps needed to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion per §192.751 (a). Williams Hot Work procedure (5.05-ADM-021) and Form WES-96 Permit to Work were provided to PHMSA at the time, however PHMSA alleges that the procedure and form only addressed the precautions after issuing the hot work permit, and they did not address the minimization of the danger of accidental ignition. During the 2017 inspection, the PHMSA representative did ask to review the Hot Work Procedure in reference to Hot Work Permits that were also reviewed. At no time did the PHMSA representative inquire about a procedure that satisfied the requirements of §192.751(a). Williams had a procedure in place, 02.10.70.23-Midstream Fire Prevention at the time of the inspection that satisfied this requirement and would have provided it upon request. That procedure (02.10.70.23-Midstream Fire Prevention) is attached and as referenced in the Revision Log at the end of the document, has been in place since August of 2005.

Proposed Compliance Order: Williams Field Services must include [procedures addressing steps to minimize the danger or accidental ignition of gas in any structure] in their manual to fulfill §192.751 (a). This must be completed within 30 days of after receipt of the Final Order.

3. **§192.477 Internal corrosion control: Monitoring.**

If corrosive gas is being transported, coupons or other suitable means must be used to determine the effectiveness of the steps taken to minimize internal corrosion. Each coupon or other means of monitoring internal corrosion must be checked two times each calendar year, but with interval not exceeding 7 1/2 months.

Proposed Compliance Order: None

Williams will reiterate the requirement to follow operations and maintenance procedures for 49CFR192 regulated facilities with field personnel.

Williams looks forward to working with PHMSA to correct the assertions in this letter. Please feel free to contact me at 405-626-1785 if you have any questions or concerns about the provided solutions to the PHMSA concerns in this letter.

Respectfully,



Clint Ratke
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Williams
Williams Field Services – Gulf Coast Company
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Enclosures (2): 07.16.01.15 - Continuing Surveillance
02.10.70.23-Midstream Fire Prevention

cc: Pat Carrol, Vice President Operations – Gulf West
Mark Cluff, Vice President – Safety & Operational Discipline
Dan Byrne, Sr Manager Operations – Gulf West
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