



U.S. Department
of Transportation

Pipeline and
Hazardous Materials Safety
Administration

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 27, 2011

Mr. Randall L. Barnard
President, Gas Pipeline
Williams
P.O. Box 1396
Houston, TX 77251-1396

CPF 5- 2011-1003W

Dear Mr. Barnard:

On April 25-28, 2011, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your Eugene District pipeline facilities. The inspection also included review of your operation and maintenance (O&M) manual as well as supporting O&M records.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violations are:

1. **§192.603 General provisions.**

- (b) **Each operator shall keep records necessary to administer the procedures established under §192.605.**

Two sections of the procedural manual were not reviewed as required by §192.605(a) in a timely manner, according to the company's own documentation. Sections pertaining to

telecommunications and measurement were reviewed annually by the assigned work groups, but not within the maximum fifteen-month interval. The measurement section was reviewed February 4, 2009, and then on September 1, 2010; this measurement section was late by three months and 26 days. The telecommunications section was reviewed on June 29, 2009 and then on October 31, 2010; this section was late by one month and two days. Procedures included in these portions of the manual could affect SCADA, emergency response, and leak detection.

2. **§192.739 Pressure limiting and regulating stations: Inspection and testing.**
 - (a) **Each pressure limiting station, relief device, (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is –**
 - (1) **In good mechanical condition;**
 - (2) **Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;**
 - (3) **Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of §192.201(a); and**
 - (4) **Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.**

The Williams' Klamath Falls Lateral has no pressure regulating or limiting equipment installed, and operates at the same pressure as the GTN mainlines that deliver gas to Williams' lateral. Williams must install adequate overpressure protection, or obtain documentation verifying the adequacy of the overpressure protection devices on the GTN system, meeting the requirements of §192.739.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the items identified in this letter. Failure to do so will result in Williams being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to CPF 5-2011-1003W. 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).

Sincerely,

A handwritten signature in black ink, appearing to read "C. Hoidal", written in a cursive style.

Christopher Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 J. Stahoviak (#132878)