



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

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

**NOTICE OF PROBABLE VIOLATION
and
PROPOSED COMPLIANCE ORDER**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 13, 2014

Ms. Allison Bridges
Vice President
Williams Northwest Pipeline, LLC
295 Chipeta Way
Salt Lake City, Utah 84108

CPF 5-2014-1002

Dear Ms. Bridges:

Between September 23, 2013 through September 27, 2013, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected Williams Northwest Pipeline, LLC's Moab District pipeline in Colorado and Utah.

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

1. **§192.179(a) Transmission line valves.**

(a) Each transmission line, other than offshore segments, must have sectionalizing block valves spaced as follows, unless in a particular case the Administrator finds that alternative spacing would provide an equivalent level of safety:

(1) Each point on the pipeline in a Class 4 location must be within 2 1/2 miles (4 kilometers) of a valve.

(2) Each point on the pipeline in a Class 3 location must be within 4 miles (6.4 kilometers) of a valve.

(3) Each point on the pipeline in a Class 2 location must be within 7 1/2 miles (12 kilometers) of a valve.

(4) Each point on the pipeline in a Class 1 location must be within 10 miles (16 kilometers) of a valve.

Williams Northwest Pipeline system did not have sectionalizing block valves at the required spacing on its mainline near the Animas Air Park in Durango, Colorado. The main line block valves are located at MP 0.2140 and MP 12.978. Between these two valves, there are two Class 3 locations of the high occupancy structures at the Animas Air Park. The first Class 3 location is between MP 6.116 and MP 6.1258 and the second is between MP 6.1834 and MP 6.2242. The southern end of the first Class 3 location is 5.9 miles from the nearest block valve at MP 0.2140, and the second Class 3 location is 6.0 miles from the block valve at MP 0.2140 and 6.75 miles from the block valve at MP 12.978. Section 192.179(a)(2) requires that each point on the pipeline in a Class 3 location be within 4 miles (6.4 kilometers) of a block valve.

Proposed Compliance Order

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations.

We have reviewed the circumstances and supporting documents involved in this case, and have decided not to propose a civil penalty assessment at this time.

With respect to item 1 pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to Northwest Pipeline, LLC. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. 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). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

In your correspondence on this matter, please refer to **CPF 5-2014-1002** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Hoidal". The signature is fluid and cursive, with a large initial "C" and "H".

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

Enclosures: *Proposed Compliance Order*
Response Options for Pipeline Operators in Compliance Proceedings

cc: PHP-60 Compliance Registry
PHP-500 J. Haddow (#143309)

PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Williams Northwest Pipeline, LLC a Compliance Order incorporating the following remedial requirements to ensure the compliance of Northwest Pipeline, LLC with the pipeline safety regulations:

1. In regard to Item Number 1 of the Notice pertaining to inadequate spacing of the mainline sectionalizing, Northwest Pipeline must add a new valve that meets the 4 mile spacing requirement for Class 3 areas. Additionally, the operator should evaluate block valve spacing on the entire pipeline system in accordance with your most recent class location study to ensure valves are correctly placed with respect to classifications.
2. Within 60 days after receipt of a Final Order the operator must install a block valve in accordance with §192.179(a)(2).
3. It is requested (not mandated) that Northwest Pipeline, LLC maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Chris Hoidal, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. It is requested 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.