



We make energy happen.®

295 Chipeta Way
Salt Lake City, UT, 84108
Jason Lambert
Manager, Pipeline Safety

April 19, 2018

Ms. Kim West
Director, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration Western Region
12300 W. Dakota Avenue, Suite 110
Lakewood, CO, 80228

Re: CPF 5-2018-3001 – Notice of Probable Violation and Proposed Civil Penalty

Dear Ms. West,

On February 20, 2018, Williams Partners Operating, LLC, (“Williams”) received a Notice of Probable Violation (NOPV) and Proposed Civil Penalty (PCP) from the Pipeline and Hazardous Materials Safety Administration (PHMSA) for the March 31, 2014 incident at Williams’ Northwest Pipeline Plymouth Liquefied Natural Gas (LNG) Plant.

Response to Notice of Probable Violation and Proposed Civil Penalty

NOPV Item 1:

Williams elects not to contest Item 1 of the NOPV and PCP.

NOPV Item 2:

Williams elects to contest Item 2 of the NOPV and PCP by submitting the following written response:

PHMSA alleges that:

“Williams violated § 193.2017 by failing to review and update its plans and procedures when new components were installed at the Plymouth Plant. Specifically, Williams installed three new manual valves in its P&R System on March 18, 2014.”

Williams respectfully disagrees with the above statement. No components were modified, and no new components were installed. The three manual valves referenced as “new” above and in the enforcement letter, were actually the original equipment valves installed near hot dust filter D-45. These

valves are used to isolate and bypass D-45. They were removed in November of 2013, sent away to be repaired off-site, and then re-installed in their original locations in March of 2014. Since no new equipment was added or modified and the process was in no way changed, a review and update of the existing operating procedure(s) was not required based on Williams interpretation of the above code section.

NOPV Item 3:

Williams elects to contest Item 3 of the NOPV and PCP by submitting the following written response:

PHMSA alleges that:

Williams failed to have procedures in place to provide safety during the start-up process. Specifically, Williams' operating procedures failed to identify that its purification and regeneration equipment would result in being operated beyond its design limits in accordance with § 193.2503(f)(4).

Williams respectfully disagrees with the above statement. The start-up process and procedures were adequate to provide safety had the purge been completed correctly as described in NOPV Item 1. Williams feels that NOPV Item 3 is duplicative as the P&R system and start-up process were not designed for a flammable air-gas mixture to be present within the piping system. This was ultimately caused by the failures already identified in NOPV Item 1. Had oxygen not been present in the piping due to the failed purge, the existing start-up procedure would have provided for the safety of personnel and equipment, and thus been in compliance with the above referenced code section.

NOPV Item 3 also references the operation of the process salt bath heater, which was started prior to the introduction of high pressure gas, as a casual factor in the incident. The existing practice of starting and raising the salt bath heater to temperature prior to introduction of gas is consistent with historical plant practice, manufacturer recommendations, and industry practices.

Williams respectfully requests an opportunity to informally discuss this response with you, preferably through an in-person visit at your convenience at the Western Region office. I will contact your office to discuss availability for this meeting. You may also contact me at 801-584-6657.

Williams is strongly committed to the safe operations of all pipeline and LNG systems. Thank you for your consideration regarding these matters.

Sincerely,



Jason Lambert

cc Dustin Hubbard
cc Peter Katchmar