June 12, 2015

VIA CERTIFIED MAIL AND FAX TO: [918-573-4900]

Mr. Alan S. Armstrong
Director, Chief Executive Officer, and President
Williams Partners, L.P.
One Williams Center
Tulsa, Oklahoma 74172

Re: CPF No. 1-2015-1013H

Dear Mr. Armstrong:

Enclosed is a Corrective Action Order issued in the above-referenced case. It requires Williams Partners, L.P. to take certain corrective actions with respect to Line B that failed on June 9, 2015, in Lycoming County, Pennsylvania. Service is being made by certified mail and facsimile. Service of the Corrective Action Order by electronic transmission is deemed complete upon transmission and acknowledgement of receipt, or as otherwise provided under 49 C.F.R. § 190.5. The terms and conditions of this Order are effective upon completion of service.

Thank you for your cooperation in this matter.

Sincerely,

Jeffrey D. Wiese
Associate Administrator
for Pipeline Safety

Enclosure

cc: Ms. Linda Daugherty, Deputy Associate Administrator for Field Operations, OPS
Mr. Byron Coy, Director, Eastern Region, OPS
Ms. Stephanie Timmermeyer, Vice President, Environmental, Health and Safety, Access Midstream Partners, L.P., 525 Central Park Oklahoma City, OK 73105

U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, D.C. 20590

In the Matter of	)	
Williams Partners, L.P.**,**	)	**CPF No. 1-2015-1013H**
Respondent.	)	

CORRECTIVE ACTION ORDER

Purpose and Background:

This Corrective Action Order (Order) is being issued, under the authority of 49 U.S.C. § 60112, to require Williams Partners, L.P. (Williams or Respondent), to take the necessary corrective action to protect the public, property, and the environment from potential hazards associated with the recent failure on William's Transcontinental Leidy Line B (Leidy Line B).

On June 9, 2015, a reportable accident occurred on Leidy Line B, resulting in the release of an undetermined amount of natural gas (the Failure). Leidy Line B is a 24-inch diameter pipeline 194.06 miles in length that originates at Station 505 (MP 0.14) and terminates at the Leidy Storage Field located in Tammerack, Pennsylvania. Line B passes through Potter, Clinton, Lycoming, Columbia, Luzerne, and Monroe Counties in Pennsylvania and Warren, Hunterdon, and Somerset Counties in New Jersey. The cause of the Failure has not yet been determined. Pursuant to 49 U.S.C. § 60117, the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), initiated an investigation of the accident. The preliminary findings of the ongoing investigation are as follows.

Preliminary Findings:

- Transcontinental Gas Pipe Line Co. LLC, an affiliate of Williams Partners, L.P., is a 10,500-mile interstate natural gas pipeline system extending from Texas, Louisiana, Mississippi, and the Gulf of Mexico through Alabama, Georgia, South Carolina, North Carolina, Virginia, Maryland, Pennsylvania, and New Jersey to the New York City metropolitan area. The system's total delivery capacity is approximately 8.4 million dekatherms.

- Leidy Line B originates at station 505 (MP 0.14) and terminates at the Leidy Storage Field located in Tammerack, PA. The majority of the pipeline is located in a Class 1 or 2 areas, with some Class 3 areas between Station 515 and Station 505 and in the Williamsport, PA area. The risk or threat to life and property is the greatest in areas where the pipeline is in close proximity to homes and dwellings.

- The "Affected Segment" is the segment of Leidy B Line from Compressor Station 517 main line valve MLV517LB0 (MP 115.19) to Leidy Storage Field (MP 194.06). The length of "Affected Segment" is 78.9 miles.

- The "Isolated Segment" is the 14.3-mile segment of the Trancontinental 24-inch Leidy Line B from Compressor Station 517 main line valve MLV 517LB0 (Mile Post .19) to main line valve MLV 517LB10 (Mile Post 129.52). The Isolated Segment is the portion of the "Affected Segment" that was shut-in after the failure on June 9, 2015, by closing main line valves MLV 517LB0 (upstream of the failure) and MLVLB10 (downstream of the failure) and that must remain shut-in until a restart plan is approved by the "Director."

- On June 9, 2015, at approximately 10:41 p.m. (EST), Williams reported that Line B failed to the National Response Center (NRC #119244). The incident occurred approximately three miles from Unityville, Pennsylvania (Mile Post 118.6). At the time of the failure, the pipeline was operating at a pressure of 1141 psig and a Maximum Allowable Operating Pressure (MAOP) of 1200 psig. The failed pipe section exhibited a 34-foot longitudinal fracture originating at the one-o'clock position on the pipeline. The failure occurred in a rural Class 1 location. While 190,832 MSCF escaped at the failure site, the gas failed to ignite. No injuries, fatalities, or other significant property damage occurred.

- The failed pipeline is a 24-inch diameter line that transports natural gas from Transcontinental Compressor Station 515 to the Leidy Storage Field, spanning a distance of approximately 88-miles (Affected Segment). The Failure occurred approximately three miles from Unityville, Pennsylvania, (Failure Site) near milepost 118.6.

- The failure occurred in a section of pipeline that was constructed in 1963. This section consists of 24-inch diameter, 0.344 wall thickness, Grade X60, EFW (Electric Flash Welded) seam pipe.

- The Maximum Operating Pressure (MOP) of the pipeline is 1200 psig, as established by a 1987 hydrostatic test. At the time of the Failure, the actual operating pressure of the pipeline was 1141 psig.

- Upon determining a pressure drop, Williams notified Gas Control staff and shut mainline valve 517LB10. Operations staff verified that isolation valves 517LB0 and S4 valves were also promptly closed *a*t station 517. By 9:30 p.m. EST the line pressure was at 0 psig.

- The Office of Pipeline Safety (OPS), Eastern Region responded to the scene. In addition, a total of 7 local fire departments responded, at varying times.

- The cause of the failure is unknown and both Williams and OPS are continuing to investigate the cause of this failure. The failed pipe section is being transported to an independent metallurgist for examination and failure analysis. Preliminary findings indicate that there was a material failure. The rupture initiated at the one o'clock, facing east. The length of the longitudinal pipe rupture was approximately 34 feet in length. At present, the pipeline is out of service.

- The accident did not cause any injuries or fatalities, but approximately 150 people were evacuated following the failure.

- State Routes 118 and 42 were temporarily closed to traffic in the affected area.

- In September 2010, Williams performed an in-line inspection (ILI) of Line B from Compressor Station 515 to Station 520, a distance of approximately 88 miles. A total of 29 locations were selected for remediation. The work was completed in 2011.

Determination of Necessity for Corrective Action Order and Right to Hearing:

Section 60112 of Title 49, United States Code, provides for the issuance of a Corrective Action Order, after reasonable notice and the opportunity for a hearing, requiring corrective action, which may include the suspended or restricted use of a pipeline facility, physical inspection, testing, repair, replacement, or other action, as appropriate. The basis for making the determination that a pipeline facility is or would be hazardous, requiring corrective action, is set forth both in the above-referenced statute and 49 C.F.R. § 190.233, a copy of which is enclosed.

Section 60112 and the regulations promulgated thereunder provide for the issuance of a Corrective Action Order, without prior notice and opportunity for hearing, upon a finding that failure to issue the Order expeditiously would result in the likelihood of serious harm to life, property, or the environment. In such cases, an opportunity for a hearing and expedited review will be provided as soon as practicable after the issuance of the Order.

After evaluating the foregoing preliminary findings of fact, I find that continued operation of the pipeline without corrective measures is or would be hazardous to life, property, or the environment. Additionally, having considered the unknown cause of the failure, the fact that recent in line inspections found no issues that could explain this failure, and the resultant risk to the area surrounding Leidy Line B, I find that a failure to issue this Order expeditiously to require immediate corrective action would result in the likelihood of serious harm to life, property, or the environment.

Accordingly, this Corrective Action Order mandating immediate corrective action is issued without prior notice and opportunity for a hearing. The terms and conditions of this Order are effective upon receipt.

Within 10 days of receipt of this Order, Respondent may contest its issuance obtain expedited review either by answering in writing or requesting a hearing under 49 C.F.R. § 190.211, to be held as soon as practicable under the terms of such regulation, by notifying the Associate Administrator for Pipeline Safety in writing, with a copy to the Director, Eastern, PHMSA (Director). If Respondent requests a hearing, it will be held telephonically or in-person in the Eastern Region office or Washington, D.C.

After receiving and analyzing additional data in the course of this investigation, PHMSA may identify other corrective measures that need to be taken. In that event, PHMSA will notify Respondent of any additional measures that are required and an amended Order issued, if necessary. To the extent consistent with safety, Respondent will be afforded notice and an opportunity for a hearing prior to the imposition of any additional corrective measures.

Required Corrective Actions:

Pursuant to 49 U.S.C. § 60112, I hereby order Williams Partners, L.P. to immediately take the following corrective actions for the Affected Segment:

CORRECTIVE ACTIONS

1. Williams must not operate the *Isolated Segment* until authorized to do so by the Director.
2. ***Operating Pressure Restriction.*** Williams must reduce and maintain a twenty percent (20%) pressure reduction in the actual operating pressure along the entire length of the *Affected Segment* such that the operating pressure along the *Affected Segment* will not exceed eighty percent (80%) of the actual operating pressure in effect immediately prior to the failure on June 9, 2015.
    a. This pressure restriction is to remain in effect until written approval to increase the pressure or return the pipeline to its pre-failure operating pressure is obtained from the Director.
    b. By June 16, 2015, Williams must provide the Director the actual operating pressures of each compressor station and each main line pressure regulating station on the *Affected Segment* at the time of failure and the reduced pressure restriction set-points at these same locations.
    c. This pressure restriction requires any relevant remote or local alarm limits, software programming set-points or control points, and mechanical over-pressure devices to be adjusted accordingly.
    d. When determining the pressure restriction set-points, Williams must take into account any in-line inspection (ILI) features or anomalies present in the *Affected Segment* to provide for continued safe operation while further corrective actions are completed.

e. Williams must review the pressure restriction monthly by analyzing the operating pressure data. Take into account any in-line inspection (ILI) features or anomalies present in the *Affected Segment* and immediately reduce the operating pressure to maintain the safe operations of the *Affected Segment*, if warranted by the monthly review. Submit the results of the monthly review to the Director. The results must include, at a minimum, the current discharge set-points (including any additional pressure reductions), and any pressure exceedance at discharge set-points.

f. Since Lines A, B and C share a common right of way in the area of the failure, Williams must also maintain a 20% pressure in Lines A and C, until excavation determines if those lines were damaged as a result of the proximity of Line B.

3. ***Restart Plan***. Prior to resuming operation of the *Isolated Segment* develop and submit a written *Restart Plan* to the Director for prior approval.

   a. The Director may approve the *Restart Plan* incrementally without approving the entire plan but the *Isolated Segment* cannot resume operation until the *Restart Plan* is approved in its entirety.

   b. Once approved by the Director, the *Restart Plan* will be incorporated by reference into this Order.

   c. The *Restart Plan* must provide for adequate patrolling of the *Isolated Segment* during the restart process and must include incremental pressure increases during start up, with each increment to be held for at least 2 hours.

   d. The *Restart Plan* must include sufficient surveillance of the pipeline during each pressure increment to ensure that no leaks are present when operation of the line resumes.

   e. The *Restart Plan* must specify a day-light restart and include advance communications with local emergency response officials.

   f. The *Restart Plan* must provide for a review of the *Isolated Segment* for conditions similar to those of the failure including a review of construction, operating and maintenance (O&M) and integrity management records such as in-line inspection (ILI) results, hydrostatic tests, root cause failure analysis of prior failures, aerial and ground patrols, corrosion, cathodic protection, excavations and pipe replacements. Williams must address any findings that require remedial measures to be implemented prior to restart.

   g. The *Restart Plan* must also include documentation of the completion of all mandated actions, and a management of change plan to ensure that all procedural modifications are incorporated into William's operations and maintenance procedures manual.

   h. The *Restart Plan* must provide for an integrity verification for the *Isolated Segment, as yet to be determined*

      Prior to restart, submit to the Director a contingency plan to operate and monitor the *Isolated Segment* during flooding conditions, including enhanced patrolling and surveillance.

4. ***Return to Service.*** After the Director approves the *Restart Plan*, Williams may return the *Isolated Segment* to service but the operating pressure must not exceed eighty percent (80%) of the actual operating pressure in effect immediately prior to the failure on June 9, 2015.

5. ***Removal of Pressure Restriction***.

   a. The Director may allow the removal or modification of the pressure restriction upon a written request from Williams demonstrating that restoring the pipeline to its pre-failure operating pressure is justified based on a reliable engineering analysis showing that the pressure increase is safe considering all known defects, anomalies, and operating parameters of the pipeline.

6. The Director may allow the temporary removal or modification of the pressure restrictions upon a written request from Williams demonstrating that temporary mitigative and preventive measures are implemented prior to and during the temporary removal or modification of the pressure restriction. The Director's determination will be based on the failure cause and provision of evidence that preventative and mitigative actions taken by the Williams provide for the safe operation of the *Affected Segment* during the temporary removal or modification of the pressure restriction. Appeals to determinations of the Director in this regard will be decided by the Associate Administrator for Pipeline Safety.

7. ***Instrumented Leakage Survey***. Within 3 days after the Affected Segment is returned to service, Williams must perform an aerial or ground instrumented leakage survey of the *Affected Segment.* Williams must investigate all leak indications and remedy all leaks discovered. Williams must submit documentation of this survey to the Director within [10] days after restart.

8. ***Records Verification***. As recommended in PHMSA Advisory Bulletin 2012-06, verify the records for the *Affected Segment* to confirm the maximum operating pressure (MOP) or maximum allowable operating pressure (MAOP). Williams must submit documentation of this record verification to the Director within 45 days of receipt of this Order.

9. ***Review of Prior Inline Inspection (ILI) Results.*** Within 30 days of receipt of this Order, conduct a review of any previous inline inspection (ILI) results of the *Affected Segment.* Re-evaluate all ILI results from the past 10 calendar years, include a review of the ILI vendors' raw data and analysis. Determine whether any features were present in the failed pipe joint and/or any other pipe removed. Also, determine if any features with similar characteristics are present elsewhere on the *Affected Segment.* Williams must submit documentation of this ILI review to the Director within 45 days of receipt of this Order as follows:

   a. List all ILI tool runs, tool types, and the calendar years of the tool runs.

   b. List, describe (type, size, wall loss, etc.), and identify the specific location of all ILI features present in the failed joint and/or other pipe removed.

   c. List, describe (type, size, wall loss, etc.), and identify the specific location of all ILI features with similar characteristics present elsewhere on the *Affected Segment.*

   d. Explain the process used to review the ILI results and the results of the reevaluation.

10. ***Mechanical and Metallurgical Testing***. Within 45 days of receipt of this Order, complete mechanical and metallurgical testing and failure analysis of the failed pipe, including an analysis of soil samples and any foreign materials. The testing and failure analysis must be completed by an independent laboratory or expert. Complete the testing and analysis as follows:

    a. Document the chain-of-custody when handling and transporting the failed pipe section

and other evidence from the failure site.

b. Within 10 days of receipt of this Order, develop and submit the testing protocol and the proposed testing laboratory to the Director for prior approval.

c. Prior to beginning the mechanical and metallurgical testing, provide the Director with the scheduled date, time, and location of the testing to allow for an OPS representative to witness the testing.

d. Ensure the testing laboratory distributes all reports whether draft or final in their entirety to the Director at the same time they are made available to Williams.

11. ***Root Cause Failure Analysis.*** Within 90 days following receipt of this Order, complete a root cause failure analysis (RCFA) and submit a final report of this RCFA to the Director. The RCFA must be supplemented/facilitated by an independent third-party acceptable to the Director and must document the decision making process and all factors contributing to the failure. The final report must include findings and any lessons learned and whether the findings and any lessons learned are applicable to other locations within William's pipeline system.

12. ***Emergency Response Plan and Training Review***. Williams must review and assess the effectiveness of its emergency response plan with regards to the failure. Include in the review and assessment the on-scene response and support, coordination, and communication with emergency responders and public officials. Also, include a review and assessment of the effectiveness of its emergency training program. Williams must amend its emergency response plan and emergency training, if necessary, to reflect the results of this review. The documentation of this *Emergency Response Plan and Training Review* must be available for inspection by OPS or provided to the Director, if requested.

13. ***Public Awareness Program Review***. Williams must review and assess the effectiveness of its Public Awareness Program with regards to the failure. Williams must amend its Public Awareness Program, if necessary, to reflect the results of this review. The documentation of this *Public Awareness Program Review* must be available for inspection by OPS or provided to the Director, if requested.

14. ***Remedial Work Plan (RWP).***

a. Within [90] days following receipt of this Order, Williams must submit a Remedial Work Plan (RWP) to the Director for approval.

b. The Director may approve the RWP incrementally without approving the entire RWP.

c. Once approved by the Director, the RWP will be incorporated by reference into this Order.

d. The RWP must specify the tests, inspections, assessments, evaluations, and remedial measures Williams will use to verify the integrity of the *Affected Segment*. It must address all known or suspected factors and causes of the June 9, 2015 failure. Williams should consider both the risk of another failure and the consequence of another failure to develop a prioritized schedule for RWP related work along the *Affected Segment.*

e. The RWP must include a procedure or process to:

i. Identify pipe in the *Affected Segment* with characteristics similar to the contributing

factors identified for the June 9, 2015failure.

ii. Gather all data necessary to review the failure history (in service and pressure test failures) of the *Affected Segment* and to prepare a written report containing all the available information such as the locations, dates, and causes of leaks and failures.

iii. Integrate the results of the metallurgical testing, root cause failure analysis, and other corrective actions required by this Order with all relevant pre-existing operational and assessment data for the *Affected Segment.* Pre-existing operational data includes, but is not limited to, construction, operations, maintenance, testing, repairs, prior metallurgical analyses, and any third party consultation information. Pre-existing assessment data includes, but is not limited to, ILI tool runs, hydrostatic pressure testing, direct assessments, close interval surveys, and DCVG/ACVG surveys.

iv. Determine if conditions similar to those contributing to the failure on June 9, 2015, are likely to exist elsewhere on the *Affected Segment.*

v. Conduct additional field tests, inspections, assessments, and/or evaluations, as to determine whether, and to what extent, the conditions associated with the failure on June 9, 2015, and other failures from the failure history (see [(e)(ii)] above) or any other integrity threats are present elsewhere on the *Affected Segment*. At a minimum, this process must consider all failure:

1) Inline inspection (ILI) tools that are technically appropriate for assessing the pipeline system based on the cause of failure on June 9, 2015,] and that can reliably detect and identify anomalies,
2) Hydrostatic pressure testing,
3) Close-interval surveys,
4) Cathodic protection surveys, to include interference surveys in coordination with other utilities (e.g. underground utilities, overhead power lines, etc.) in the area,
5) Coating surveys,
6) Stress corrosion cracking surveys,
7) Selective seam corrosion surveys; and,
8) Other tests, inspections, assessments, and evaluations appropriate for the failure causes.

Note: Williams may use the results of previous tests, inspections, assessments, and evaluations if approved by the Director, provided the results of the tests, inspections, assessments, and evaluations are analyzed with regard to the factors known or suspected to have caused the June 9, 2015 failure.

vi. Describe the inspection and repair criteria Williams will use to prioritize, excavate, evaluate, and repair anomalies, imperfections, and other identified integrity threats. Include a description of how any defects will be graded and a schedule for repairs or replacement.

vii. Based on the known history and condition of the *Affected Segment*, describe the methods Williams will use to repair, replace, or take other corrective measures to remediate the conditions associated with the pipeline failure on [date] and to address other known integrity threats along the *Affected Segment*. The repair, replacement, or

other corrective measures must meet the criteria specified in [1(d)(vi)] above.

viii. Implement continuing long-term periodic testing and integrity verification measures to ensure the ongoing safe operation of the *Affected Segment* considering the results of the analyses, inspections, evaluations, and corrective measures undertaken pursuant to the Order.

f. Include a proposed schedule for completion of the RWP.

g. Williams must revise the RWP as necessary to incorporate new information obtained during the failure investigation and remedial activities, to incorporate the results of actions undertaken pursuant to this Order, and/or to incorporate modifications required by the Director.

i. Submit any plan revisions to the Director for prior approval.

ii. The Director may approve plan revisions incrementally.

iii. Any and all revisions to the RWP after it has been approved and incorporated by reference into this Order will be fully described and documented in the CAO Documentation Report (CDR).

h. Implement the RWP as it is approved by the Director, including any revisions to the plan.

15. ***CAO Documentation Report (CDR***). Williams must create and revise, as necessary, a CAO Documentation Report (CDR). When Williams has concluded all the items in this Order it will submit the final CDR in its entirety to the Director. This will allow the Director to complete a thorough review of all actions taken by Williams with regards to this Order prior to approving the closure of this Order. The intent is for the CDR to summarize all activities and documentation associated with this Order in one document.

a. The Director may approve the CDR incrementally without approving the entire CDR.

b. Once approved by the Director, the CDR will be incorporated by reference into this Order.

c. The CDR must include but not be limited to:

i. Table of Contents;

ii. Summary of the pipeline failure of June 9, 2015, and the response activities;

iii. Summary of pipe data/properties and all prior assessments of the *Affected Segment*;

iv. Summary of all tests, inspections, assessments, evaluations, and analysis required by the Order;

v. Summary of the Mechanical and Metallurgical Testing as required by the Order;

vi. Summary of the RCFA with all root causes as required by the Order;

vii. Documentation of all actions taken by Williams to implement the RWP, the results of those actions, and the inspection and repair criteria used;

viii. Documentation of any revisions to the RWP including those necessary to incorporate the results of actions undertaken pursuant to this Order and whenever necessary to incorporate new information obtained during the failure investigation and remedial activities;

ix. Lessons learned while completing this Order;

x. A path forward describing specific actions Williams will take on its entire pipeline system as a result of the lessons learned from work on this Order; and

xi. Appendices (if required).

Other Requirements:

1. *Reporting.* Submit reports to the Director that: (1) include all available data and results of the testing and evaluations required by this Order; and (2) describe the progress of the repairs or other remedial actions being undertaken. The first quarterly report is due on September 1, 2015. The Director may change the interval for the submission of these reports.

2. *Documentation of Costs.* It is requested but not required that Respondent maintain documentation of the costs associated with implementation of this Order. Include in each monthly report the to-date total costs associated with: (1) preparation and revision of procedures, studies and analyses; (2) physical changes to pipeline infrastructure, including repairs, replacements and other modifications; and (3) environmental remediation, if applicable.

3. *Approvals.* With respect to each submission requiring the approval of the Director, the Director may: (a) approve the submission in whole or in part; (b) approve the submission on specified conditions; (c) modify the submission to cure any deficiencies; (d) disapprove the submission in whole or in part and direct Respondent to modify the submission; or (e) any combination of the above. In the event of approval, approval upon conditions, or modification by the Director, Respondent shall proceed to take all action required by the submission, as approved or modified by the Director. If the Director disapproves all or any portion of a submission, Respondent must correct all deficiencies within the time specified by the Director and resubmit it for approval.

4. *Extensions of Time.* The Director may grant an extension of time for compliance with any of the terms of this Order upon a written request timely submitted and demonstrating good cause for an extension.

The actions required by this Corrective Action Order are in addition to and do not waive any requirements that apply to Respondent's pipeline system under 49 C.F.R. Part 192, under any other order issued to Respondent under authority of 49 U.S.C. § 60101, *et seq*., or under any other provision of Federal or State law.

Respondent may appeal any decision of the Director to the Associate Administrator for Pipeline Safety. Decisions of the Associate Administrator shall be final.

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).

Failure to comply with this Order may result in the assessment of civil penalties and in referral to the Attorney General for appropriate relief in United States District Court pursuant to 49 U.S.C. § 60120.

In your correspondence on this matter, please refer to **CPF No. 1-2015-1013H** and for each document you submit, please provide a copy in electronic format whenever possible.

The terms and conditions of this Corrective Action Order are effective upon receipt.

_____ _____

Jeffrey D. Wiese
Associate Administrator
for Pipeline Safety

Date Issued