U.S. Department
of Transportation

**Pipeline and
Hazardous Materials
Safety Administration**

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

WARNING LETTER

OVERNIGHT EXPRESS DELIVERY

July 22, 2019

Mr. Mark Cluff
VP Safety & Operational Discipline
Transcontinental Gas Pipe Line Company
One Williams Center, PO Box 645
Tulsa, OK 74172

CPF 1-2019-1011W

Dear Mr. Cluff:

From May 16-17, 2017, June 26-27, 2017, and May 9-10, 2018, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Transcontinental Gas Pipe Line Company's (Transco) Garden State Expansion Project in Princeton, New Jersey.

As a result of the inspection, it is alleged that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (CFR). The items inspected and the probable violation are:

1. **§ 192.303 Compliance with specifications or standards.**

   Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

Transco failed to follow its comprehensive written specifications or standards consistent with Part 192 for constructing transmission lines. Specifically, Transco failed to document nondestructive testing of welds in accordance with its WilSOP Weld Inspection Film Reports instructions, developed to comply with § 192.243(f).

Section 192.243(f) states:

> (f) When nondestructive testing is required under § 192.241(b), each operator must retain, for the life of the pipeline, a record showing by milepost, engineering station, or by geographic feature, the number of girth welds made, the number nondestructively tested, the number rejected, and the disposition of the rejects.

During the inspection, the PHMSA inspector reviewed WilSOP Weld Inspection Film Reports (Job Description/Project Name/Purpose of Inspection: Garden State Exp M/S; Inspection Dates: 9-19-16, 9-20-16, 12-13-16; W.O.:1165551) as evidence of nondestructive test records for pipeline segments on the Garden State Expansion Project in New Jersey. The records appeared to not be documented to Transco's WilSOP requirements. The Defect Legend and Grading Scale annotations templated in the WilSOP Weld Inspection Film Reports required Grading Scale annotations as follows: 1 (small/minor), 2 (moderate/borderline) or 3 (excessive/reject). However, the records reviewed were marked with a check mark for welding defects and not a 1, 2 or 3, as was required.

Therefore, Transco failed to document its nondestructive testing in accordance with its WilSOP Weld Inspection Film Report instructions, developed to comply with § 192.243(f).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed $213,268 per violation per day the violation persists, up to a maximum of $2,132,679 for a related series of violations. For violation occurring on or after November 2, 2015 and before November 27, 2018, the maximum penalty may not exceed $209,002 per violation per day, with a maximum penalty not to exceed $2,090,022. For violations occurring prior to November 2, 2015, the maximum penalty may not exceed $200,000 per violation per day, with a maximum penalty not to exceed $2,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in Transcontinental Gas Pipe Line Company being subject to additional enforcement action.

Please 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).

No reply to this letter is required. If you choose to reply, please submit all correspondence in this matter to Robert Burrough, Director, PHMSA Eastern Region, 840 Bear Tavern Road, Suite 300, West Trenton, NJ 08628. Please refer to **CPF 1-2019-1011W** on each document you submit, and whenever possible provide a signed PDF copy in electronic format. Smaller files may be emailed to robert.burrough@dot.gov. Larger files should be sent on USB flash drive accompanied by the original paper copy to the Eastern Region Office.

Sincerely,

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration