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November 20, 2024.
James Urisko
Director, Southern Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
U.S Department of Transportation
233 Peachtree Street Ne, Suite 602
Atlanta, GA 30303

Re: Transcontinental Gas Pipeline Company (Transco) response letter inspection package CPF 2-2024-014-NOPV

Dear Mr. Urisko,

Following a 2023 inspection of Transco facilities, records, and procedures in Delaware, New Jersey, New York, and Pennsylvania, on October 24, 2024, the Pipeline and Hazardous Materials Safety Administration (PHMSA) issued CPF 2-2024-014-NOPV, a Notice of Probable Violation and a Proposed Civil Penalty, alleging four (4) probable violations. This letter is Transco's response to those alleged violations.

1. Allegation #1: 49 C.F.R. §192.619

Transco failed to comply with 49 C.F.R. § 192.619(a) because it operated a segment of steel pipeline at pressures that exceeded the MAOP as determined by § 192.619. PHMSA as required by § 191.23 for an MAOP exceedance at the Milltown Regulator Station. The SRCR described that the MAOP exceeded between August 17, 2023, and August 30, 2023. The line segment's MAOP is 676psig. After reviewing Milltown Regulator Pressure Data from Transco, it was determined that Transco operated the section of pipe at pressures exceeding 110% of MAOP for 11 days and 16 hours between August 17, 2023, and August 30, 2023. The maximum pressure during this time was 778.5psig or 115% of MAOP.

PHMSA also issued a Proposed Penalty of \$59,800 for this alleged violation.

Response:

Transco does not dispute the alleged violation and does not dispute the proposed civil penalty of \$59,800.

2. Allegation #2: 49 C.F.R. §192.905

Transco failed to comply with 49 C.F.R. §192.905(a) because it did not identify a high consequence area (HCA) on its Harrison Lateral. During a site visit on November 2, 2023, along the Harrison Lateral in New Jersey, a PHMSA inspector observed multiple 5-story apartment buildings and a stadium adjacent to Transco's right-of-way. This location was not classified as an HCA at this time, despite the proximity of the pipeline to the apartment buildings and stadium. The two apartment buildings have 280 and 286 units, and were built in 2018 and 2017, respectively. The stadium has



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a seating capacity of 25,000 and hosts the local Major League Soccer and National Women's Soccer team home games, along with other sports, concerts, and community events. A subsequent review of Transco's KMZ files, created from Williams's "Pipeline Open Data Standard" (PODS) database, confirmed that the apartment buildings and the stadium fall within the pipeline's potential impact radius. Transco utilized method 2 under § 192.903 to define its HCAs. Transco personnel explained that during an update to the PODS database intended to identify Moderate Consequence Areas in 2021, the HCA was inadvertently excluded and downgraded to a non-HCA. This HCA was dropped sometime between June 7, 2021 and June 6, 2022, and remained as a non-HCA until observed during the field inspection by the PHMSA inspector on November 2, 2023. The HCA was subsequently added back to the system on November 6, 2023.

Response:

Transco does not dispute this allegation. Immediately following PHMSA's November 2, 2023 site visit during the inspection, Transco personnel undertook a review of this area and added the missing structures and attributes for the 4+ story buildings. Transco performed gas consequence analysis, restoring the HCA on a born-on date of 6/19/2004. Additionally, Transco engaged a consultant to complete a system-wide review of its existing structure dataset, convert structure points to polygons, update attribution, and identify new structures not currently captured in the existing structure dataset. Transco relied on this updated structure data for gas consequence analysis in 2024. Transco also reviewed its structure domain list and verified that site structure codes are correctly identified in the software tool configuration. These improvements and reviews have been implemented to ensure improved accuracy of gas consequence analysis results. Further, Transco's parent company, the Williams Companies, executed a similar review to its other existing structure datasets across its other transmission assets.

3. Allegation #3: 49 C.F.R. §192.5

Transco failed to comply with 49 C.F.R. §192.5(b)(4) because it did not identify a Class 4 location along its Harrison Lateral. During a site visit on November 2, 2023, along the Harrison Lateral in New Jersey, a PHMSA inspector observed four five-story apartment buildings and a multi-story stadium adjacent to Transco's right-of-way. The four apartment buildings were built in 2015, 2017, 2018, and 2023, and include between 280 and 399 apartments in each building. Red Bull arena was built in 2010 and has a seating capacity of 25,000. A review of Transco's KMZ files, created from Williams' PODS database, confirmed that Transco had listed the referenced area as a Class 1 location. Transco subsequently updated this location to a Class 4 location and presented this information to PHMSA inspectors during the week of November 27, 2023.

Response:

Transco does not dispute this allegation. Immediately following PHMSA's November 2, 2023 site visit during the inspection, Transco undertook a review of this area and added the missing structures and attributes for the 4+-story buildings. Transco performed class location analysis, resulting in a Class 4 location from the stadium to the end of the line by the 4+ story apartment buildings. The pipe and the strength pressure test are commensurate for operation at the existing MAOP under 192.619 without requiring operation under 192.611. Additionally, Transco engaged



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a consultant to complete a system-wide review of its existing structure dataset, convert structure points to polygons, update attribution, and identify new structures not currently captured in the existing structure dataset. Transco relied on this updated structure data for class location analysis in 2024. Transco also reviewed its structure domain list and verified that 4+story buildings and 4+story identified site structure codes are correctly identified in the software tool configuration. These improvements and reviews have been implemented to ensure improved accuracy of class location analysis results. Further, Transco's parent company, the Williams Companies, executed a similar class location analysis across its other transmission assets.

4. Allegation #4: 49 C.F.R. §191.7

Transco failed to comply with 49 C.F.R. § 191.17(a)(1) because it did not complete all required information in its annual reports. Specifically, Transco failed to completely document all information in Part F of its annual report for calendar years 2020 and 2021. Transco submitted Annual Reports to PHMSA for calendar years 2020 and 2021 as required by § 191.17. In each report, the following information was not populated:

2020 Annual Report

Part F: Section 2c, titled "Total Number of ILI conditions repaired WITHIN AN HCA SEGMENT meeting the definition of "immediate repair conditions," "One-year conditions," "Monitored conditions," and "Other Scheduled conditions" as defined in 192.933(d)."

2021 Annual Report

Part F: Section 2c, titled "Total Number of ILI conditions repaired WITHIN AN HCA SEGMENT meeting the definition of "immediate repair conditions," "One-year conditions," "Monitored conditions," and "Other Scheduled conditions" as defined in 192.933(d)." • Part F: Section 4c, titled "Total Number of DA conditions repaired WITHIN AN HCA SEGMENT meeting the definition of "immediate repair conditions," "One-year conditions," "Monitored conditions," and "Other Scheduled conditions" as defined in 192.933(d)."

Furthermore, the 2021 Annual Report was submitted on 03/16/2022, 1 day after the deadline of March 15, 2022, as required by § 191.17(a)(1).

Response:

Transco recognizes the importance of accurate and complete data and, prior to this inspection, took steps to ensure checks & balances are in place to avoid reoccurrence of these gaps in the annual reports. Transco does not dispute this allegation. Transco's annual report now undergoes two levels of review before it is submitted. Further, Transco personnel was coached on expectations for a thorough review and timely submission.

Williams is firmly committed to operating safely and in full accordance with all applicable Pipeline Safety regulations. The organization consistently strives to enhance the safety and integrity of its operations. Should you have any questions, please do not hesitate to contact me.



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Respectfully,

A handwritten signature in black ink that reads "Amy Shank". The signature is written in a cursive, flowing style.

Amy Shank
Vice President of Safety & Operational Discipline
Amy.Shank@williams.com