



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

230 Peachtree Street N.W.
Suite 2100
Atlanta, GA 30303

WARNING LETTER

**VIA ELECTRONIC MAIL TO: amy.shank@williams.com; mason.jones@williams.com;
edgar.x.rodriguez@williams.com; Jorge.Lopez2@williams.com**

July 18, 2025

Amy Shank
Vice President of Safety & Operational Discipline
Transcontinental Gas Pipe Line Company
One Williams Center
MD 43-4
Tulsa, OK, 74172

CPF 2-2025-003-WL

Dear Ms. Shank:

From May 1, 2023 to December 1, 2023, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected Transcontinental Gas Pipe Line Company (Transco) procedures, records, and facilities in Delaware, New Jersey, New York, and Pennsylvania.

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 item inspected and the probable violation is:

1. § 192.5 Class Locations.

(a) This section classifies pipeline locations for purposes of this part. The following criteria apply to classifications under this section.

- (1) A “class location unit” is an onshore area that extends 220 yards (200 meters) on either side of the centerline of any continuous 1- mile (1.6 kilometers) length of pipeline.**
(2)....

(b) Except as provided in paragraph (c) of this section, pipeline locations are classified as follows:

- (1) A Class 1 location is:**
(i) An offshore area; or
(ii) Any class location unit that has 10 or fewer buildings intended for human occupancy.
(2) A Class 2 location is any class location unit that has more than 10 but fewer than 46 buildings intended for human occupancy.
(3) A Class 3 location is:
(i) Any class location unit that has 46 or more buildings intended for human occupancy; or
(ii) An area where the pipeline lies within 100 yards (91 meters) of either a building or a small, well-defined outside area (such as a playground, recreation area, outdoor theater, or other place of public assembly) that is occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period. (The days and weeks need not be consecutive.)

Transco failed to comply with 49 CFR § 192.5(b) because it failed to properly classify certain Class 2 and Class 3 locations.

At the time of PHMSA's inspection, Transco presented its current class locations graphically through KMZ files generated from Williams's^a PODS database. Two locations, one just north of Dallas Township, Pennsylvania, and the other just northeast of Spring House, Pennsylvania, were noted as Class 1 and 2 locations in the KMZ files, respectively. However, each of these locations met the definition of a Class 2 and Class 3 location, respectively.

Each location consisted of a main line with a branch line extending laterally from the main line. The main line near Dallas Township at the Springville Lateral was listed as a Class 1 location, while the branch line was also listed as a Class 1 location. However, Buildings Intended for Human Occupancy (BIHOs) were located within 220 yards of the centerline on the mainline and branch line such that more than 10 BIHOs were contained within the class location unit extending from the main line to the branch line. The main line near Spring

^a Transco is a subsidiary of Williams and uses its programs and procedures. *See* <https://www.williams.com/pipeline/transco/> (last accessed May 30, 2025).

House at the Oreland Lateral was listed as a Class 3 location, while the branch line was listed as a Class 2 location. However, Buildings Intended for Human Occupancy (BIHOs) were located within 220 yards of the centerline on the mainline and branch line such that 46 or more BIHOs were contained within the class location unit extending from the main line to the branch line. The transition from the main to the branch line is a continuous length of pipeline under § 192.5(a)(1).

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$272,926 per violation per day the violation persists, up to a maximum of \$2,729,245 for a related series of violations. For violation occurring on or after December 28, 2023 and before December 30, 2024, the maximum penalty may not exceed \$266,015 per violation per day the violation persists, up to a maximum of \$2,660,135 for a related series of violations. For violation occurring on or after January 6, 2023 and before December 28, 2023, the maximum penalty may not exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a related series of violations. For violation occurring on or after March 21, 2022 and before January 6, 2023, the maximum penalty may not exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,142 for a related series of violations. For violation occurring on or after May 3, 2021 and before March 21, 2022, the maximum penalty may not exceed \$225,134 per violation per day the violation persists, up to a maximum of \$2,251,334 for a related series of violations. For violation occurring on or after January 11, 2021 and before May 3, 2021, the maximum penalty may not exceed \$222,504 per violation per day the violation persists, up to a maximum of \$2,225,034 for a related series of violations. For violation occurring on or after July 31, 2019 and before January 11, 2021, the maximum penalty may not exceed \$218,647 per violation per day the violation persists, up to a maximum of \$2,186,465 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 identified in this letter. Failure to do so will result in Transcontinental Gas Pipe Line Company being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 2-2025-003-WL**. 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).

Sincerely,

James A. Urisko
Director, Southern Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration