Williams Olefins Feedstock Pipelines, LLC
1 One Williams Center
Tulsa, OK 74103

April 1, 2021

Mary L. McDaniel, P.E.
Director, Southwest, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston, TX 77074

Re: CPF No 4-2021-004 NOA

Ms. McDaniel,

On March 2, 2021, Williams Olefins Feedstock Pipelines, LLC (Williams) received the subject Notice of Amendment (NOA) from the Pipeline and Hazardous Materials Safety Administration (PHMSA). The NOA is the result of PHMSA's inspection of the Bayou Ethane Pipeline system occurring from February 24, 2020 to September 9, 2020.

Williams is fully committed to maintaining the safety of its assets and has reviewed the alleged inadequacies within its plans and procedures. In accordance with the provided Response Options for Pipeline Operators in Enforcement Proceedings, Williams provides the following response. All procedure revisions explained below and provided in the attachments will be implemented on July 1, 2021 according to Williams' procedure revision implementation schedule. All procedure revisions impacting Operations are reviewed by a focus team of operations leaders to determine impacts and make preparations to be fully compliant with the revised procedure upon implementation. In some cases, this review has not yet been completed so Williams has provided a redlined version of the procedure demonstrating the changes that will be implemented on July 1.

Item 1
§ 195.426 - Scraper and sphere facilities.
No operator may use a launcher or receiver that is not equipped with a relief device capable of safely relieving pressure in the barrel before insertion or removal of scrapers or spheres. The operator must use a suitable device to indicate that pressure has been relieved in the barrel or must provide a means to prevent insertion or removal of scrapers or spheres if pressure has not been relieved in the barrel.

PHMSA alleges that Williams does not have a procedure that provides guidance for safely relieving pressure in the barrel or the receiver of a launcher or receiver.

Williams Response:
Williams does not contest this finding and has amended procedure 07.11.00.03 – Pipeline Pigging Operations (Attachment 1) to require that pressure is relieved in the barrel prior to opening. See highlighted steps 1.4, 3.2 and 4.2.

Item 2
§ 195.428 - Overpressure safety devices and overfill protection systems.
(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile

liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device, relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

PHMSA alleges that Williams does not have a procedure that includes inspection and testing guidance for regulators, high- or low-pressure shutdowns, high/high or low/low pressure shutdowns, and automatic shutoff devices.

Williams Response:
Williams does not contest this finding. As mentioned in Williams' January 8, 2021 response to PHMSA's Post Inspection Written Preliminary Findings, this system is protected from overpressure by means of safety control systems and shutdowns rather than relief valves or regulators. Williams has amended the Overview & Applicability section of 07.05.70.12 – Midstream Tests and Inspections of Overpressure Protection and Pressure Limiting Devices (Attachment 2) to align with this system design. Williams also modified section 5.0 of 07.05.70.12 to apply to all controller operated pressure shut in devices, not just high pressure shut ins. Section 5.0 was already being followed for testing and inspecting these overpressure protection devices. Any regulators installed on this system are not used for overpressure protection and therefore, the mention of regulators was deleted from the Overview & Applicability section in this procedure. The inspection and testing of these operational regulators is addressed by other procedures.

Item 3
§ 195.422 – Pipeline Repairs
(a) Each *operator* shall, in repairing its *pipeline systems*, insure that the repairs are made in a safe manner and are made so as to prevent damage to persons or property.

PHMSA alleges that Williams' procedure 07.55.50.08 – Gas Pipes Installation and Removal of Stopples is inadequate to address the requirement because it is not written to be applicable to hazardous liquid assets.

Williams Response:
Williams contests this finding. This was not included in the preliminary findings issued by PHMSA on November 3, 2020. Had it been Williams would have been able to provide PHMSA a copy of procedure 07.55.00.01 – Welding and Non-Destructive Examination (Attachment 3). This procedure includes the requirement for the installation and removal of stopples during hot tapping for liquid pipelines in section 8.0 - Line Isolation. These revisions were initiated March of 2020 and subsequently implemented on July 23, 2020.

Item 4
§ 195.422 – Procedure manual for operations, maintenance, and emergencies.
(a) …
(c) *Maintenance and normal operations*. The manual required by paragraph (a) of this section must include procedures for the following to provide safety during maintenance and normal operations:
(1) …
(13) Periodically reviewing the work done by operator personnel to determine the effectiveness of the procedures used in normal operation and maintenance and taking corrective action where deficiencies are found.

PHMSA alleges that the Williams Periodic Operations and Maintenance (O&M) Performance Reviews (PPR) described in procedure 12.02.00.03 – WIMS Reviews and performed every five years is inadequate and does not meet the regulatory requirement. PHMSA alleges that the review of work done by operator personnel must be performed annually, not to exceed 15 months.

Williams Response:
Williams concurs that 195.402(a) requires an annual review of the manual of written procedures but must disagree with PHMSA's reading of 195.402(c)(13) requiring review of work done by the operator to

determine effectiveness of the procedures to also occur within a calendar year. Section 195.402(c) lists the various components required to be in the manual identified in section 195.402(a). In subparagraph 13, the agency directs the operator to have a provision in its manual whereby the operator conducts a periodic review of the work done by operator personnel in order to evaluate the effectiveness of the procedures. The Williams' manual reviewed by PHMSA contains this required provision. The plain language of the regulation does not support PHMSA's stated interpretation in this finding.

Nevertheless, while Williams objects to this interpretation, Williams has other procedures and practices in place that augment the periodic performance review frequency and satisfy PHMSA's interpretation.

- Section 1.4 of 12.02.00.03 (Attachment 4) describes Williams' Annual Manual Review process which encourages Process Owners (subject matter experts responsible for procedure content) to communicate with employees that use the procedures for potential improvement recommendations.
- Operator personnel who use these procedures are a critical part of Williams' continuous improvement culture and as such they are encouraged and do submit change requests to procedures anytime deficiencies or areas for improvement are identified while performing work. When a change request is submitted, it is promptly reviewed by the Process Owners and subject matter experts, including Pipeline Safety for any change request with regulatory implications. Since April 1, 2020, there have been a total of 351 change requests submitted to all Williams procedures, guidelines and manuals, (irrespective of code applicability). Of those, 62 were submitted by operator personnel. The subset of those changes applicable to the O&M Manual(s) for 49 CFR Part 192/193/195 assets, is 128 changes, 17 of which were submitted by operator personnel. These numbers do not include changes that were rejected or selected to not be implemented. This demonstrates that procedural effectiveness is continually being evaluated and corrective actions taken.
- Williams performs a root cause analysis of all incidents that meet a defined severity threshold. As part of each investigation, the procedures being followed are reviewed for effectiveness and whether procedural gaps contributed to the incident. Any corrective actions identified specific to procedures are submitted as change requests according to the process described in the previous bullet.
- Williams Pipeline Safety personnel perform regular internal reviews across the enterprise to evaluate compliance with O&M procedures. These reviews include soliciting feedback from operator personnel on the effectiveness of procedures and any suggested corrective actions can be submitted according to the process detailed in the second bullet.

These additional measures demonstrate that in addition to the annual manual review required by 195.402(a) and a periodic performance review required by 192.402(c)(13), all Williams O&M procedures are continually being reviewed for effectiveness and corrective actions taken to eliminate deficiencies meeting and exceeding PHMSA's interpretation in this finding.

Williams appreciates this opportunity to identify and correct gaps in its procedures. If there are any questions with respect to Williams' response to these requested amendments or if any additional documentation is needed, please contact me by phone or email.

Respectfully,

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cc: Amy Shank, Director, Asset Integrity