



U.S. Department of Transportation  
**Pipeline and Hazardous Materials  
Safety Administration**

8701 S. Gessner, Suite 630  
Houston TX 77074

**NOTICE OF PROBABLE VIOLATION,  
PROPOSED CIVIL PENALTY,  
and  
PROPOSED COMPLIANCE ORDER**

**ELECTRONIC MAIL - RETURN RECEIPT REQUESTED**

June 17, 2022

Mark Cluff  
Vice President Safety & Operational Discipline  
Williams Field Services - Gulf Coast Company, LP  
One Williams Center  
P.O. Box 645  
Tulsa, Oklahoma 74172

**CPF 4-2022-038-NOPV**

Dear Mr. Cluff:

From May 18, 2021 through September 2, 2021, 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 Williams Field Services - Gulf Coast Company, LP's (Williams) offshore natural gas pipeline system in the Gulf of Mexico.

As a result of the inspection, it is alleged that Williams has committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations (C.F.R.). The item inspected and the probable violation is:

- 1. § 192.477 Internal corrosion control: Monitoring.**  
**If corrosive gas is being transported, coupons or other suitable means must be used to determine the effectiveness of the steps taken to minimize internal corrosion. Each coupon or other means of monitoring internal corrosion must be checked two times each calendar year, but with intervals not exceeding 7 ½ months.**

Williams failed to monitor the effects of corrosive gas on the interior of its pipeline two times each calendar year at intervals not exceeding 7 ½ months in accordance with § 192.477. Specifically, Williams missed 14 internal corrosion coupon inspections from 2017 through 2021.

Williams transports corrosive gas in its Gulf of Mexico offshore gathering pipelines. Williams' *Corrosion Control for Gas Transportation, 11.0 Internal Corrosion Control* (Revision 3, Effective Date: 7/22/2021) manual (Corrosion Control Manual) defines "corrosive gas" as "a gas which, by chemical reaction with the pipe to which it is exposed, usually metal, produces a deterioration of the material." Due to the transportation of corrosive gas, Williams injects corrosion inhibitors to mitigate internal corrosion and uses internal corrosion coupons to monitor the effectiveness of its internal corrosion program. The internal corrosion coupons measure the deterioration of the pipe.

Section 11.1 of Williams' Corrosion Control Manual states "[i]f a corrosive environment is present, perform internal corrosion monitoring at least twice each calendar year, not to exceed 7 ½ months." Pursuant to the Corrosion Control Manual, Williams records the results of these semiannual coupon inspections on its form F-227 Corrosion Coupon Report.

In calendar years 2017, 2018, 2019, 2020, and 2021, 14 required internal corrosion coupon inspections were missed or exceeded the 7 ½ months required interval.

Therefore, Williams failed to monitor the effects of corrosive gas on the interior of its pipeline two times each calendar year at intervals not exceeding 7 ½ months in accordance with its Corrosion Control Manual § 192.477.

Proposed Civil Penalty

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, Williams Field Services – Gulf Coast Company, LP is subject to a civil penalty not to exceed \$239,142 per violation per day the violation persists, up to a maximum of \$2,391,412 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. For violation occurring on or after November 27, 2018 and before July 31, 2019, the maximum penalty may not exceed \$213,268 per violation per day, with a maximum penalty not to exceed \$2,132,679. 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.

We have reviewed the circumstances and supporting documentation involved for the above probable violation(s) and recommend that you be preliminarily assessed a civil penalty of \$33,300 as follows:

<u>Item number</u>	<u>PENALTY</u>
1	\$33,300

Proposed Compliance Order

With respect to Item 1 pursuant to 49 U.S.C. § 60118, the Pipeline and Hazardous Materials Safety Administration proposes to issue a Compliance Order to Williams Field Services - Gulf Coast Company, LP. Please refer to the *Proposed Compliance Order*, which is enclosed and made a part of this Notice.

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Enforcement Proceedings*. Please refer to this document and note the response options. All material you submit in response to this enforcement action may be 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).

Following the receipt of this Notice, you have 30 days to submit written comments or request a hearing under 49 C.F.R. § 190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order. If you are responding to this Notice, we propose that you submit your correspondence to my office within 30 days from receipt of this Notice. This period may be extended by written request for good cause.

In your correspondence on this matter, please refer to **CPF 4-2022-038-NOPV** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Mary L. McDaniel, P.E.  
Director, Southwest Region  
Pipeline and Hazardous Materials Safety Administration

Enclosures: *Proposed Compliance Order*  
*Response Options for Pipeline Operators in Enforcement Proceedings*

## PROPOSED COMPLIANCE ORDER

Pursuant to 49 United States Code § 60118, the Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to issue to Williams Field Services - Gulf Coast Company, LP a Compliance Order incorporating the following remedial requirements to ensure compliance with the pipeline safety regulations:

- A. In regard to Item 1 of the Notice pertaining to Williams' failure to examine the internal corrosion coupons in accordance with § 192.477, Williams must submit the findings from a root cause failure analysis performed by an independent technical expert regarding the company's failure to complete the inspections to PHMSA for review within **90** days of receipt of the Final Order. In addition, Williams must conduct the required internal corrosion inspections within 30 days of receipt of the Final Order.

It is requested (not mandated) that Williams Field Services - Gulf Coast Company, LP maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Mary L. McDaniel, Director, Southwest, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with the preparation/revision of plans, procedures, studies, and analyses, and 2) the total cost associated with replacements, additions, and other changes to pipeline infrastructure.