



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

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

WARNING LETTER

VIA E-MAIL TO MR. ALAN ARMSTRONG

April 21, 2023

Mr. Alan Armstrong
President
The Williams Companies, Inc.
One Williams Center
P.O. Box 2400
Tulsa, OK 74172

CPF 5-2023-026-WL

Dear Mr. Armstrong:

From June 21, 2022, to September 1, 2022, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected The Williams Companies, Inc.'s (Williams) Overland Pass hazardous liquid pipeline and Parachute to Greasewood Express (PGX) hazardous liquid pipeline.

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

1. **§ 195.5 Conversion to service subject to this part.**
 - (a)
 - (d) **An operator converting a pipeline from service not previously covered by this part must notify PHMSA 60 days before the conversion occurs as required by § 195.64.**

Williams failed to notify PHMSA 60 days before converting a pipeline from service not previously covered by Part 195 as required by § 195.64. Specifically, Williams did not notify PHMSA 60 days before the 4" and 6" NGL lines from the exit of the plant boundaries to the PGX pipeline (Line ID # 20003 and 20004) were converted to service. During the PHMSA inspection, Williams failed to produce any records demonstrating that they notified PHMSA 60 days before converting these lines to service. PHMSA also confirmed that this change was not made on its National Registry of Operators, available at <https://portal.phmsa.dot.gov>.¹

2. § 195.402 Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies. This manual shall be reviewed at intervals not exceeding 15 months, but at least once each calendar year, and appropriate changes made as necessary to insure that the manual is effective. This manual shall be prepared before initial operations of a pipeline system commence, and appropriate parts shall be kept at locations where operations and maintenance activities are conducted.

Williams failed to follow a manual of written procedures for conducting normal operations and maintenance activities. Specifically, Williams' procedure entitled *07.11.01.05 Valve Inspection and Maintenance Procedure* states that each hazardous liquid DOT Valve must be inspected and partially operated to determine if it is functioning properly at least twice per calendar year, not to exceed 7 ½ months.² During the PHMSA inspection, Williams' valve inspection record entitled *F07-812 Valve Inspection Report* indicated Williams failed to partially operate 16 of the 18 mainline valves on their PGX-HVL system on 4/21/2020 and 4/22/2020.³

Valve ID	Valve Operation
XV-1306, XV-4925B	Fully Operated
XV-4623, XV-4627, XV-8002, XV-9500, XV-9501, B0031, B0032, MOV-9504, XV-9505, XV-9701, MOV-1004, MOV-1104, MOV-1005, MOV-1105, XV-9700, B6001	Not Operated

Under 49 U.S.C. § 60122 and 49 CFR § 190.223, you are subject to a civil penalty not to exceed \$257,664 per violation per day the violation persists, up to a maximum of \$2,576,627 for a

¹ See § 195.64(c)(iv) (requiring operators to notify PHMSA electronically through the National Registry of Operators at <https://portal.phmsa.dot.gov> 60 days prior to converting a pipeline to service under § 195.5).

² See Exhibit A-1 (attached and on file with PHMSA).

³ See Exhibit A-2 (attached and on file with PHMSA).

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. 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 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 items identified in this letter. Failure to do so will result in Williams 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 5-2023-026-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,

Dustin Hubbard
Director, Western Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 L. Green, J. Luo, C. Cordova (#22-234737)