

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 25, 1998

Mr. Bob Bahnick, Vice President
Williams Gas Pipeline Company/Central Region
One Williams Center
P.O. Box 3288
Tulsa, Oklahoma 74101-9990

Dear Mr. Bahnick:

CPF No. 48102C

Between August 18 and December 19, 1997, a representative of the Southwest Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of all your facilities in the states of Oklahoma and Texas that are jurisdictional to the Southwest Region, OPS.

During the inspection OPS found two items causing concern about the safe operation and maintenance of your pipeline facilities.

1. Your annual report showed that between March 1996 and January 1997, more than one thousand leaks occurred on your 20-inch line from Pampa, Texas, to Alva, Oklahoma. Williams Gas Pipeline Company's representatives verified almost all of these leaks occurred in the Pampa 20-inch system.

Your field supervisors explained that traditional temporary or permanent measures to protect the public, such as the installation of bolt-on-leak clamps or reduction of operating pressure, are either unfeasible, because of gas delivery commitments or impracticable because the line will be abandoned when construction of a replacement line is completed.

As an alternative to these measures this office recommends that you increase the frequency of pipeline patrols and that the kind of patrol, air, walking or driving, be appropriate for the immediate pipeline location, such as the proximity of homes or places where people congregate or at highway and rail crossings. Records of the patrols will be maintained.

2. At the time of the field inspection at your Alva Compressor Station, two cigarette butts

were observed on the ground outside the pump room. One of these was directly under valve No. 31, engine No. 3; this is the leaking valve discussed in CPF No. 48101W, dated February 9, 1998. The discovery of these cigarette butts in an area in which there should be no ignition sources leads this office to the following conclusions:

- a. The employees at the compressor station are poorly trained about the dangers of ignition sources and smoking in areas where there is a possibility of the presence of gas.
- b. The employees are careless and negligent about safety at compressor stations.

This office recommends that during gas safety training for employees increased emphasis be placed on minimizing the dangers of accidental ignition in buildings and areas where the presence of gas constitutes a hazard of fire or explosion. The dangers of ignition sources in areas where gas is being vented, either intentional or as a result of leaks should be stressed. It may be prudent to have fire extinguishers near such areas.

You will not hear from us again with regard to this concern. Because of the good faith that you have exhibited up to this time, we expect that you will act to ensure that the problem discussed in this letter will be addressed.

Please refer to CPF No. 48102C in any correspondence/communication on this matter.

Sincerely,

R. M. Seeley
Regional Director, Southwest Region