

LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 10, 1999

Mr. Steven S. Ball
Vice President of Operations & Engineering
Williams Pipe Line Company
One Williams Center
P.O. Box 3448
Tulsa, OK 74101

CPF No. 39507C

Dear Mr. Ball:

On December 10, 1998, a representative of the Department of Public Safety, State of Minnesota, acting as an agent for interstate pipelines for the Central Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of Williams Pipe Line Company's (WPL) ARANCO facility at Roseville, Minnesota.

During the inspection, two items of concern were noted.

1. Your O&M plans do not specify numbers needed to contact railroad officials should an emergency occur that would require the stoppage of rail traffic through an area. Although Williams personnel might not specifically make the contact, emergency phone numbers should be available for emergency officials to call on your behalf.
2. The second concern is an issue that has been addressed in CPF No. 38501 to your attention regarding semi-annual inspection of mainline valves. Procedures and records indicate that WPL did not subject some normally closed mainline valves to semi-annual inspections. Williams has made the distinction of normally open (NO) and normally closed (NC) mainline valves in the Operations and Maintenance Manual.

We are concerned that these NC mainline valves will possibly be utilized in operating the pipeline as your "NO" mainline valves are used. The inspection revealed that there are

instances where the operation of valves that are located in stations and designated "NC" must be used to isolate sections of mainline piping. It is essential that WPL perform inspections on all valves required to isolate sections of mainline piping in an emergency and document such inspections. Personnel stated that the valves in question would be placed on the annual DOT inspection forms. I would appreciate your attention to this matter of concern system-wide and request that you provide me with information as to the status of action taken and/or planned to address the above item or your input in regard to Williams' position concerning this matter.

If we can answer any questions or be of any assistance, please contact me or Warren Miller at (816) 426-2654. Thank you for your staff's cooperation during this scheduled inspection.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety