

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 9, 1998

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

Dear Mr. Bahnick:

CPF No. 48101W

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

As a result of the inspection, it appears that you have committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The items inspected and the probable violations are:

1. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
 - (a) **General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.**

At the time of this inspection, Williams Natural Gas's Policy/Procedure, Title: No Smoking Policy states: "as part of its commitment to provide a safe, healthy work environment for its employees, the Company has declared all of its facilities and vehicles to be smoke free." However, Williams Natural Gas's representatives indicated to our inspector, that the company employees are not permitted to smoke

inside of any building but they are permitted to smoke within the facility outside of any building. It appears that Williams Natural Gas is not following the written policy/procedure for a smoke free facility.

2. **§192.711 Transmission Lines: General requirements for repair procedures. a) Each operator shall take immediate temporary measures to protect the public whenever:**

- (1) A leak, imperfection, or damage that impairs its serviceability is found in a segment of steel transmission line operating at or above 40 percent of the SMYS; and**
- (2) It is not feasible to make a permanent repair at the time of discovery. As soon as feasible the operator shall make permanent repairs.**

At the time of the inspection in your Alva Compressor Station, a 16-inch check valve in the manifold discharge piping, engine #3, valve #31 was leaking; the noise of gas blowing could be heard from a distance. The valve was above ground and in an open area, there was no yellow ribbon around the leaking valve or any kind of warning sign posted to warn the public that the valve is leaking.

Under 49 United States Code, §60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations.

We have reviewed the circumstances and supporting documents involved for the violations in this case, and have decided not to assess you a civil penalty. We advise you, however, that should you not correct the circumstances leading to the violations we will take enforcement action when and if the continued violations come to our attention.

Please refer to CPF No. 48101W in any correspondence/communication on this matter.

Sincerely,

R. M. Seeley
Regional Director, Southwest Region