

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 13, 2012

Mr. Randy Newcomer
Vice President – Operations Performance
Williams Field Services Company
One Williams Center
MD 43
Tulsa, OK 74172

CPF 3-2012-5007W

Dear Mr. Newcomer:

On October 24-28, 2011, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your records and facilities in Conway, KS. We understand that Williams Field Services Company took over operations of the facility and pipeline in April of 2011 and that most of the records reviewed were from the previous operator.

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

1. §195.428 Overpressure safety devices and overfill protection systems.

(a) Except as provided in paragraph (b) of this section, each operator shall, at intervals not exceeding 15 months, but at least once each calendar year, or in the case of pipelines used to carry highly volatile liquids, at intervals not to exceed 7½ months, but at least twice each calendar year, inspect and test each pressure limiting device,

relief valve, pressure regulator, or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition, and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.

A review of the overpressure protection records showed that the setpoint for Yuma Station in May 2011 was 1300 psig. Per a previous surge analysis, the setpoint at Yuma was established as 1282 psig in 2010. However, there was no explanation or evaluation demonstrating that an increase to 1300 psig in May 2011 was an adequate setting to provide the necessary overpressure protection.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. 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 item identified in this letter. Failure to do so will result in Williams Field Services Company 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 3-2012-5007W**. 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,

David Barrett
Director, Central Region
Pipeline and Hazardous Materials Safety Administration