

**NOTICE OF PROBABLE VIOLATION
and
PROPOSED CIVIL PENALTY**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 5, 2011

Mr. Larry Hjalmarson
Vice President
Williams Gas Pipeline - Transco
2800 Post Oak Boulevard
PO Box 1396, MD 11324
Level Twelve (12)
Houston, Texas 77056

CPF 4-2011-1001

Dear Mr. Hjalmarson:

On October 18-20 and October 25-28, 2010 a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your Cypress Division Districts 30, 35, 40 and 45 from Edna, Texas to Kinder, Louisiana.

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

1. §192.739 Pressure limiting and regulating stations: Inspection and testing

- (a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and test to determine that it is-**
- (1) In good mechanical condition;**
 - (2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;**
 - (3) Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of §192.201(a); and**
 - (4) Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.**

Williams Gas Pipeline – Transco (Transco) failed to inspect and properly operate the relief devices which are required to prevent an actual overpressure situation for eight (8) compressor units at Station 45 within the timeframes required by regulation. While the operator completed the inspections within the maximum 15 month period, they failed to perform the inspections during the calendar year of 2007.

Transco’s Operations and Maintenance Manual Policy 60.02.00.13: Regulator and Overpressure Protection Systems specifically paragraph 2.1 states, “It is the policy of WGP to inspect and test each regulator, relief valve and other overpressure protection device, and high gas pressure shutdown device (electric or pneumatic) used in natural gas service once each calendar year, not to exceed 15 months.” The results are recorded on Transco’s form WGP-0132C.

During the inspection, Transco provided records documenting the inspections. The records showed the inspections as having occurred in December 2006 and January 2008, but no inspections were documented in the calendar year of 2007. Specifically, WGP – 0132C forms for Station 45, Ragley compressor station were reviewed, Main Unit’s number 1 thru 8, verify that the inspection frequency exceeded the calendar year requirement.

Proposed Civil Penalty

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. The Compliance Officer has reviewed the circumstances and

supporting documentation involved in the above probable violation(s) and has recommended that you be preliminarily assessed a civil penalty of \$ 23,800.

Response to this Notice

Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. 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). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

In your correspondence on this matter, please refer to **CPF 4-2011-1001** and for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous
Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*