



Larry Hjalmarson
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January 31, 2011

Mr. Rodrick Seeley
Director, Southwest Region
PHMSA
Department of Transportation
Office of Pipeline Safety
8701 South Gessner Drive, Suite 1110
Houston, Texas 77074

CPF: CPF 4-2011-1001

RE: Williams Gas Pipeline Company, LLC; Notice of Probable Violation and Civil Penalty Response

Dear Mr. Seeley:

Williams Gas Pipeline Company (WGP) received the above referenced PHMSA Notice of Probable Violation (NOPV) letter on January 11, 2011. The NOPV included a civil penalty assessment of \$23,800, which was paid by wire transfer on January 13, 2011.

The NOPV involved exceeding the calendar year inspection requirement for relief valves and revealed the need to determine corrective actions to minimize the chance of recurrence. Therefore, a root cause analysis was completed, and it was determined that recurring tasks that are scheduled to be completed late in the year are at risk of exceeding the calendar year completion requirement per PHMSA regulations and WGP's operations and maintenance manual policies and procedures.

For many years, WGP has employed a maintenance scheduling software application (OMS), and it was discovered during the root cause analysis that the tracking and scheduling features of the OMS application were not being fully utilized in this particular case. As a result of the root cause analysis, we are requiring each District within WGP to reassess its calendar year scheduling dates and adjust the inspection schedules, as needed, to limit the risk of exceeding the allowable compliance interval. In addition, enhancements are being added to the OMS application to provide monthly email reminders preceding the due dates and, monthly thereafter, until the task is verified as complete.

We believe these corrective actions will allow individuals to take full advantage of the regulatory inspection intervals and limit the risk of recurrence.

We believe the actions described above address the issues that were raised in your NOPV letter. Should you have any questions or have any additional improvement recommendations, please contact me at the address above or Marie Sotak at 713 215-2111.

Sincerely,

A handwritten signature in blue ink that reads "Larry Hjalmarson". The signature is fluid and cursive, with the first name "Larry" being the most prominent part.

Larry Hjalmarson