Mr. Larry Hjalmarson Vice President, Safety Environmental and Integrity Transcontinental Gas Pipe Line Company, LLC 2800 Post Oak Boulevard Houston, TX 77056

Re: CPF No. 1-2011-1015

Dear Mr. Hjalmarson:

Enclosed please find the Final Order issued in the above-referenced case. It makes a finding of violation and assesses a civil penalty of \$50,000. This is to acknowledge receipt of payment of the full penalty amount, by wire transfer, dated October 13, 2011. This enforcement action is now closed. Service of the Final Order by certified mail is deemed effective upon the date of mailing, or as otherwise provided under 49 C.F.R. § 190.5.

Thank you for your cooperation in this matter.

Sincerely,

Jeffrey D. Wiese Associate Administrator for Pipeline Safety

#### Enclosure

cc: Mr. Byron Coy, Director, Eastern Region, OPS

Mr. Alan Mayberry, Deputy Associate Administrator for Field Operations, OPS

Mr. Randy Barnard, President, Gas Pipeline, Williams Partners GP, LLC

#### CERTIFIED MAIL - RETURN RECEIPT REQUESTED [71791000164203306651]

# U.S. DEPARTMENT OF TRANSPORTATION PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION OFFICE OF PIPELINE SAFETY WASHINGTON, D.C. 20590

	)	
In the Matter of	)	
	)	
Transcontinental Gas Pipe Line	)	
Company, LLC,	)	CPF No. 1-2011-1015
a/k/a Williams Gas Pipeline—TRANSCO,	)	
	)	
Respondent.	)	
	)	

### **FINAL ORDER**

On August 31 to September 3, 2009, pursuant to 49 U.S.C. § 60117, a representative of the New York Department of Public Service, as agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), conducted an on-site pipeline safety inspection of the facilities and records of Transcontinental Gas Pipe Line Company, LLC (Transco or Respondent) in Staten Island, New York. Transco operates an interstate natural gas transportation system that covers 10,000 miles and serves major markets in New York City, Atlanta, and the Mid-Atlantic region, including two natural gas pipelines in the Staten Island area approximately 15 miles in length.

As a result of the inspection, the Director, Eastern Region, OPS (Director), issued to Respondent, by letter dated October 5, 2011, a Notice of Probable Violation and Proposed Civil Penalty (Notice). In accordance with 49 C.F.R. § 190.207, the Notice proposed finding that Transco had violated 49 C.F.R. § 192.605(a) and proposed assessing a civil penalty of \$50,000 for the alleged violation.

Transco responded to the Notice by letter dated October 10, 2011 (Response). The company did not contest the allegation of violation and paid the proposed civil penalty of \$50,000, as provided in 49 C.F.R. § 190.227. Payment of the penalty serves to close the case with prejudice to Respondent.

<sup>&</sup>lt;sup>1</sup> Williams Partners L.P., is a master limited partnership involved in the transportation, gathering, treating, processing, and storage of oil and natural gas. According to its website, Williams Partners L.P., owns a 100 percent interest in Transco. http://www.williamslp.com/Gas\_Pipeline (last accessed Jan. 9, 2012).

## FINDING OF VIOLATION

In its Response, Transco did not contest the allegation in the Notice that it violated 49 C.F.R. Part 192, as follows:

**Item 1:** The Notice alleged that Respondent violated 49 C.F.R. § 192.605(a), which states:

# § 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 once 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.

The Notice alleged that Respondent violated 49 C.F.R. § 192.605(a) by failing to prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response. Specifically, the Notice alleged that Transco failed to follow its own procedure, *Corrosion Control Policy* 20.08.00.07, "*External Corrosion Control: Electrical Isolation*," which required Respondent's employees to verify the electrical isolation of cased pipelines by surveying and analyzing casing-to-soil potentials at those locations at least once every five years, preferably on an annual basis. The Notice alleged that Transco could not provide records showing that the company had performed the required electrical isolation surveys and analyses for three different covered locations: Milepost (MP) 216+35; MP 221+24; and MP 492+00.

Respondent did not contest this allegation of violation. Accordingly, based upon a review of all of the evidence, I find that Respondent violated 49 C.F.R. § 192.605(a) by failing to prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response.

This finding of violation will be considered a prior offense in any subsequent enforcement action against Respondent.

The terms and conditions of this Final Order are effective upon service in accordance with 49 C.F.R. § 190.5.

Jeffrey D. Wiese	Date Issued
Associate Administrator	
for Pipeline Safety	