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August 15, 2007

Mr. Chris Hoidal, P.E.
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W Dakota Ave.
Suite 110
Lakewood CO 80228

SENT TO COMPLIANCE REGISTRY
Hardcopy Electronically
of Copies 1 / Date 8/16/07

RE: CPF No. CPF 5-2007-1004M

Mr. Hoidal:

This letter is in response to PHMSA's Notice of Amendment regarding the Williams Gas Pipelines' Integrity Management Program. Please find enclosed Williams' responses to the issues raised in the NOA. Most of the responses take the form of a change in a procedure. Williams had amended some of the procedures before the NOA was received, so to help facilitate the verification process, an Index listing the specific NOA item and location where it was addressed has been included.

Due to the volume of the material and per previous PHMSA requests, the data is being sent to you on a CD. If you have any problem with the CD or you would like paper copies, please let me know.

Please contact me at 713 215 2537 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Randy Eckert" with a stylized flourish.

Randy Eckert
Director of Pipeline Safety and Integrity
Williams Gas Pipeline

Williams Gas Pipeline CPF 5-2007-1004M

- Item 1A: WGP 10.09.03 Section 8.1.8 & Appendix A
WGP 10.09.03 Section 8.1 & 9.1
WGP 10.09.03 Section 8.1.8
WGP 10.09.03 Section 10.1.4 & 8.1.9
- Item 1B: WGP 10.09.03 Section 10.1.4
- Item 1C: WGP 10.09.03 Section 3.1.1
- Item 1D: WGP 10.09.03 Section 3.2.2 & 3.3.2
- Item 1E: WGP 10.09.03 Section 3.3.2
- Item 1F: WGP 10.09.03 Section 8.1.12
WGP 10.09.03 Section 8.1 & 9.1
WGP 10.09.03 Section 8.1.8
WGP 10.09.03 Section 10.1.4 & 8.1.9
- Item 2A: WGP 10.08.01 Section 8
- Item 2B: WGP 10.25.01 Section 6.1.2.1
- Item 3A: As explained during the May 23rd 2007 hearing, WGP has not eliminated SCC threat.
- Item 3B: WGP 10.25.01 Sections 7.1.2, 8.1.2.3.1
- Item 3C: Data Management Procedure
- Item 3D: Data Management Procedure
- Item 3E: WGP 10.25.01 Section 4.1.1.2.2.
- Item 3F: Data Management Procedure and WGP 10.25.01 Sections 4.1.1.2.2 & 4.1.1.2.3
- Item 3G: WGP 10.25.01 Section 8.1.1
- Item 3H: WGP 20.15.03 Section 8.0

The Following references for all Items in the “4’s” and 6A are contained in the Williams ECDA Standard dated November 14th, 2006. It should be noted that this procedure is presently being revised in order to integrate the cased pipeline ECDA procedure.

- Item 4A: Addressed in Section 2.9 Special Requirements, Pg. 13 of 99
Addressed in Section 3.4.4 1st Assessment Requirements, Pg. 16 of 99, Form A (Data Element 4.6) Pg. 80 of 99

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Addressed in Section 3.9.3 1st Assessment Requirement, Pg. 34 of 99

- Item 4B: Addressed in Section 4.3 Above Ground Procedure Review, Pgs 39 thru 41 of 99 and documented on Form F pg. 89 of 99
Addressed in Section 4.4 Indirect Inspection Field Meeting, Pgs 41 thru 42 of 99
Addressed in Section 4.5 Indirect Inspections, Pgs 42 thru 44 of 99
Addressed in Section 4.6.2.5 Survey Plots, Pg. 45 of 99
Addressed in Section 4.6.2.6 GPS Coordinates, Pg. 45 of 99
- Item 4C: Addressed in Section 4.8 Aligning Indications, Pgs 48 thru 49 of 99 and Form G Pg. 90 of 99
Addressed in Section 4.9.2.1 Priority I, Pg. 49 of 99
Addressed in Section 4.12 Indirect Inspection Analysis, Pg. 53 of 99
- Item 4D: Addressed in Section 3.9 Indirect Inspection Method (IIM) Selection, Pgs 33 thru 34 of 99. Note specifically stated in Section 3.9.3 1st Assessment Requirement, Pg. 34 of 99
- Item 4E: Addressed in Section 5.2 Number of Excavations, Pg. 54 of 99, Figure 5.1, Pg. 55 of 99 and Table 5.1, Pg. 56 of 99
- Item 4F: Addressed in Section 5.8 External Corrosion (EC) Root Cause Analysis, Pgs 62 thru 64 of 99, Form J, Pg. 94 of 99
- Item 4G: Addressed in Section 5.9 Reclassification and Reprioritization of Indications Pgs 64 thru 66, Figure 5.7, Pg. 67 of 99
- Item 4H: Addressed in Section 5.8.5 ECDA Evaluation, Pg. 63 of 99, Form J, Pg. 94 of 99
- Item 4I: Addressed in Section 5.0 Direct Examination, Pgs 54 thru 67 of 99
Addressed in Section 5.2.2.2 Initial ECDA Projects, Pg. 57 of 99
- Item 5A: WGP ECDA Standard, Section 5.7
WGP 70.14.01, Section 3.1.6
- Item 5B: WGP 70.17.01, Figure 9
- Item 5C: WGP meets the requirements of CFR 49 192.933 to “demonstrate that the remediation of the condition will ensure that the condition is unlikely to pose a threat to the integrity of the pipeline until the next reassessment of the covered segment.” by addressing the threat through WGP’s normal maintenance activities, for example; external corrosion is addressed by recoating and addressing CP issues and internal corrosion is address by pigging and use of corrosion inhibitors.

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WGPs' repair procedures, including the use of type B sleeves, are designed and used in accordance with industry standards which is supported by research and testing, and meets the requirements of CFR 49 192.713 (a)(2).

- Item 5D: WGP 70.17.01, Section 8.1.3 and 8.1.4
- Item 5E: WGP 70.17.01, Figure 4 and Figure 6.
- Item 5F: WGP 70.17.01, Figure 5
- Item 5G: WGP 70.17.01, Figure 6
- Item 5H: Williams ECDA Standard Section 4.11.3 and 4.11.4
- Item 5I: Williams ECDA Standard Section 4.11.3

- Item 6A: WGP ECDA Standard
Addressed in Section 5.6.2.4 Documentation, Pg. 62 of 99
Addressed in Section 5.7 Required Actions, Pg. 62 of 99
Addressed in Section 5.8 External Corrosion (EC) Root Cause Analysis, Pgs 62 thru 64 of 99, Form J, Pg. 94 of 99, In addition a WGP 0092 is filled out for every pipeline exposure.

- Item 6B: WGP 10.25.01, Section 8.1.2.3.2
- Item 6C: WGP 10.25.01, Section 8.1.2.3.2

- Item 7A: WGP 10.24.01 Section 3.0 and Form 0250.
Procedure 10.24.01 lists the responsibility of who is to gather and track performance measure data as either the Manager of Pipeline Safety or Manager of Integrity. Generally, WGP's O&M Policy and Procedures do not delegate below the manager level.

- Item 8A: WGP 10.25.01, Sections 4.1.1.1.2 & 5.1.1. & 6.1.1
- Item 8B: WGP 10.25.01, Section 6.1.3
- Item 8C: WGP 10.25.01, Section 8.0
- Item 8D: WGP 10.29.01, Section 6.1.3.16
- Item 8E: WGP 10.29.01 (entire procedure has been revised)
- Item 8G: WGP 10.08.01 Section 9.1.1

- Item 9A: Williams believes Chapter 2 and the policies and procedures in the WGP O&M manual are in agreement, but Williams will seek to address any specific examples that PHMSA provides.
- Item 9B: WGP 10.26.01, Section 5
- Item 9C: WGP 10.26.01
- Item 9D: Williams believes the code does not address establishing minimum qualifications for vendors nor does it describe minimum qualification as mentioned in the NOAs. B31.8S 12.2(c) only refers to controlling and documenting the process of using outside sources.

WGP uses outside vendors for numerous activities, such as integrity assessments, inspection, and construction. WGP qualifies these vendors in various ways, depending on the type of contractor, the type of work they are doing, and WGP's level of expertise. Below is a generalization of the three methods WGP uses to approve contractors and vendors.

Performance Based

For some work, WGP hires contractors and vendors to complete projects with minimal review of their procedures or personnel qualifications. WGP provides a contract with an end result described – the contractor or vendor must meet the results defined in the procedures of the contract. For example, when WGP hires a contractor to complete an HDD of a river, the contract normally defines path the crossing must stay within and the condition the pipe must be in when complete. However, WGP does not normally define how the contractor must complete the work or who the contractor can use. The pipe at the end of the job simply must be in a condition prescribed beforehand by WGP.

Procedure Based – WGP Procedures

For some processes, WGP has detailed procedures that the contractors or vendors must follow. WGP will provide detailed procedures to be followed, as well as drawings and other documents to direct the process. Examples include construction of compressor station or meter station facilities. WGP will also qualify personnel, including testing welders, reviewing the background of construction foremen and other contract labor.

Procedure Based – Review of Vendors Procedures

For some processes, WGP asks the vendor or contractor to provide their procedures for review and WGP reviews and approves these procedures. Examples include ECDA work.

Item 9E: Chapter 14 Section 3.4

Item 9F: Williams requires that ILI vendors shall meet Williams' performance standards and the qualifications of the vendor employees shall be monitored and managed by the vendor. Williams annually reviews whether vendors have fully complied with the ILI specifications. Williams seeks clarification as to whether PHMSA is suggesting operators verify the qualifications of third party employees who provide accepted technologies.

Item 9G: WGP will develop and implement a policy that verifies that non-mandatory requirements (e.g., "should" statements) from industry standards or other documents invoked by Subpart O (e.g., ASME B31.8S-2001 and NACE RP0502-2002) are incorporated into the operator's plan and implemented as recommended in the standard; or an equivalent alternative method for accomplishing the same objective is justified and implemented; or a documented justification is included in the plan that demonstrates the technical basis for not implementing recommendations from standards or other documents invoked by Subpart O.

Williams is not clear that the NOA statement "Though WGP has verbally stated they will: 1) incorporate into their IM plan or procedures they will adopt all "should" statements," makes the distinction between addressing "shoulds" in industry standards or other documents invoked by Subpart O and addressing "shoulds" throughout the entire WGP O&M manual. Williams seeks clarification on this issue.