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August 17, 2010

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



CPF: 4-2010-1002

**RE: Transcontinental Gas Pipe Line Company, LLC (Operator ID# 19570):
Valve Security Survey Compliance Order Response**

Mr. Seeley:

Williams Gas Pipelines (WGP) received the subject letter on May 24, 2010 concerning Notice of Probable Violations (NOPVs) resulting from pipeline safety inspections in southern Louisiana.

The NOPV included a Compliance Order, which required WGP to perform remedial requirements. The remedial requirements and corresponding WGP responses are summarized below:

1. WGP should survey all transmission line sectionalizing block valves and replace all decorative style chains and other non-secure methods with security chain or other secure methods to ensure that valves are protected from tampering.

Response: WGP has completed a valve security survey of all 46 Districts across the Northwest, Transco, and Gulfstream systems. All identified security deficiencies have been corrected or are scheduled to be corrected.

2. WGP should complete the survey, replacement, of non-security chain and determination of protection from tampering within 90 days of receipt of the NOPV letter.

Response: The security deficiencies identified for sectionalizing block valves that could be corrected by security chain and lock have been completed. Some valve locations determined to require new fencing, fencing repairs, or additional methods as a result of the security survey and identified threats are scheduled to be completed by August 24, 2011. As an interim measure, facilities requiring security upgrades will have increased patrol frequency until completion. The completion dates for each Districts security survey are documented in the enclosed "Valve Security Survey Completion Dates" spreadsheet.

3. WGP shall maintain documentation of the safety improvement costs associated with fulfilling the Compliance Order and submit the total to R.M. Seeley, Director, Southwest

Region, Pipeline and Hazardous Materials Safety Administration. Costs shall be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies, and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure.

Response: The total costs of fulfilling the compliance order for each category are:

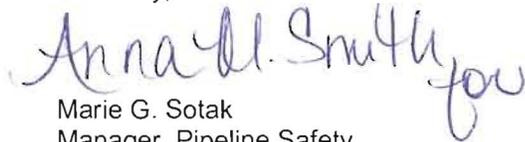
- 1) Updated procedures and completion of security survey: \$73,600
- 2) Costs of fencing, chains, locks, and valve modifications: \$223,000

Enclosed is a CD that includes an electronic copy of this letter and the enclosed spreadsheet referenced above.

We believe the security survey is an effective approach to verifying the valve security status across the WGP system. If you have any questions or need more information, please contact me at 713 215-2111.

We appreciate the constructive guidance provided by PHMSA personnel in dealing with this matter and the promotion of our mutual goals of pipeline safety.

Sincerely,

A handwritten signature in blue ink that reads "Anna M. Smith" with a stylized flourish at the end.

Marie G. Sotak
Manager, Pipeline Safety
Williams Gas Pipelines

Enclosures

Valve Security Survey Completion Dates

August 16, 2010

Districts*	Location	Survey Completion Date
CYPRESS DIVISION (Transco)	Houston, TX	
South Texas District	Corpus Christi, TX	7/29/2010
Station 14	Falourias, TX	7/29/2010
District 24	Markham, TX	7/2/2010
Station 30	El Campo, TX	7/13/2010
District 35	Houston, TX	7/14/2010
District 40	Sour Lake, TX	7/14/2010
Station 44	Cameron, LA	8/2/2010
District 45	Ragley, LA	7/7/2010
District 50	Eunice, LA	7/30/2010
District 54	Washington, LA	7/21/2010
District 60	Jackson, LA	7/7/2010
Schriever	Schriever, LA	7/29/2010
Station 62	Gibson, LA	7/23/2010
Station 63	Convent, LA	7/21/2010
Station 64	Paulina, LA	7/21/2010
District 65	Greensburg, LA	7/8/2010
ATLANTA DIVISION (Transco)	Duluth, GA	
District 70	Tylertown, MS	8/13/2010
Station 77	Seminary, MS	7/27/2010
District 80	Heidelberg, MS	7/27/2010
Station 82	Citronelle, AL	7/12/2010
District 90	Myrtlewood, AL	7/7/2010
District 100	Billingsley, AL	7/20/2010
District 110	Wadley, AL	7/7/2010
District 115	Newnan, GA	7/7/2010
Station 125	Monroe, GA	6/8/2010
District 130	Comer, GA	8/16/2010
District 140	Moore, SC	7/30/2010
CHARLOTTEVILLE DIVISION (Transco)	Charlottesville, VA	
Station 145	Grover, NC	7/28/2010
District 150	Moorestville, NC	7/28/2010
District 155	Lexington, NC	7/13/2010
Station 157(PineN)	Stokesdale, NC	7/13/2010
District 160	Reidsville, NC	7/30/2010
Station 162(Card)	Apex, NC	7/30/2010
District 165	Chatham, VA	6/14/2010
Station 167	South Hill, VA	6/14/2010
District 170	Appomattox, VA	6/14/2010
Station 175	Scottsville, VA	6/8/2010
District 180	Unionville, VA	7/7/2010
District 185	Manassas, VA	7/7/2010
District 190	Ellicott City, MD	7/9/2010
PRINCETON DIVISION (Transco)	Princeton, NJ	
Station 195	Delta, PA	7/8/2010
District 200	Frazer, PA	7/8/2010
Station 205	Princeton, NJ	6/11/2010
Station 207	Old Bridge, NJ	6/11/2010
District 240	Carlstadt, NJ	7/7/2010
District 505	Neshanic Station, NJ	6/11/2010
District 515	Bear Creek, PA	7/2/2010
Station 517	Benton, PA	7/6/2010
District 520	Salladasburg, PA	6/9/2010
District 535	Austin, PA	6/9/2010
Linden Crew	Linden, NJ	7/7/2010
Mt Laurel Crew	Mt Laurel, NJ	6/11/2010
NORTHWEST PIPELINE DIVISION	Salt Lake City, UT	
Battle Ground Dist	Battleground, WA	6/28/2010
Boise District	Meridian, ID	7/22/2010
Eugene District	Eugene, OR	6/28/2010
Kemmerer District	Kemmerer, WY	7/16/2010
Moab District	Moab, UT	6/28/2010
Plymouth District	Plymouth, WA	6/28/2010
Pocatello District	Pocatello, ID	6/28/2010
Redmond District	Redmond, WA	6/28/2010
Spokane District	Spokane, WA	7/12/2010
Sumas District	Sumas, WA	6/28/2010
Vernal District	Vernal, UT	6/30/2010