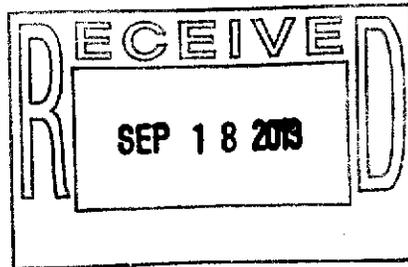




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2800 Post Oak Boulevard
P. O. Box 1396
Houston, Texas 77251-1396



September 17, 2013

Mr. Rodrick M. Seeley
Director, PHMSA Southwest Region
Pipeline and Hazardous Material Safety Administration
8701 South Gessner, Suite 1110
Houston, Texas 77074

CPF: 4-2013-9001W

**Re: Response to Warning Letter New Construction Notification
Offshore Gas Pipeline "Tubular Bells"
Request for Interpretation**

Dear Mr. Seeley,

On August 14, 2013, Williams received a Warning Letter from PHMSA- Southwest Region. The Warning Letter pertained to a new construction notification to construct a 17 mile offshore gas pipeline in the Gulf of Mexico.

The notification was sent by Williams via the PHMSA portal on May 3, 2013, with an anticipated construction start date of May 13, 2013. This date corresponded to when Williams began mud mat installation in preparation for pipe construction and installation. Pipe construction actually began on August 6, 2013.

Williams is not contesting the warning letter, and has identified action items to assure that future notifications are made 60 days prior to the start of construction activities. However, the definition of what is considered the "start date of construction" is not clearly defined in 49 CFR Part 191.22.

As a result of the uncertainty of what defines the commencement of construction activities in the regulations, Williams is requesting that PHMSA provide a formal interpretation of the word "construction" as cited in 49 CFR Part 191.22. This request will be followed with an official request made to Mr. John Gale, Director, Office of Regulations. Please advise if further action is required.

Sincerely,

Marie G. Sotak
Manager, Pipeline Safety Gas and Liquids - East